

PRIVACY POLICY
for the Copernicus Trail mobile application and the website
<http://szlak.kopernikowski.uwm.edu.pl/en/>

1. General information

This Privacy Policy sets out the rules for the processing of personal data in connection with the use of the Copernicus Trail mobile application and the website <http://szlak.kopernikowski.uwm.edu.pl/en/>, hereinafter jointly referred to as the “Service”.

The controller of personal data is Uniwersytet Warmińsko-Mazurski w Olsztynie, with its registered seat at ul. Michała Oczapowskiego 2, 10-719 Olsztyn, e-mail: rafal.kazmierczak@uwm.edu.pl, hereinafter referred to as the “Controller”.

If the Controller has appointed a Data Protection Officer, the DPO may be contacted at: rafal.kazmierczak@uwm.edu.pl.

2. Scope and sources of data

In connection with the use of the Service, the Controller may process the following data:

- a) technical data concerning the device and software
- b) IP address
- c) data on the manner in which the Service is used

d) location data, if the user grants the relevant permission on the device

e) data provided in correspondence addressed to the Controller

Data may be obtained:

a) directly from the user

b) automatically while using the Service

c) from the user's device settings, to the extent permitted by the permissions granted

3. Purposes and legal bases for data processing

The Controller processes personal data for the following purposes:

- ✓ ensuring the operation of the Service and its functionalities, including the proper display of content, maintenance of security, and error handling – the legal basis is the Controller's legitimate interest in ensuring the proper and secure operation of the Service
- ✓ making location-based functions available to the user – the legal basis is the user's consent expressed through the device settings or by granting the application access to location data
- ✓ analysing the use of the Service, creating statistics, and improving functionalities – the legal basis is the Controller's legitimate interest and, where technologies requiring consent are used, the user's consent
- ✓ handling contact, enquiries, complaints, and requests submitted to the Controller – the legal basis is the Controller's legitimate interest in conducting communication and handling requests

- ✓ establishing, pursuing, or defending against claims – the legal basis is the Controller's legitimate interest

4. Location data

The application may use the device's location data only after the user has granted the relevant permission.

Providing location data is voluntary; however, it may be necessary for certain Service functions to operate.

Location data are used only to the extent necessary for location-based functions.

The application does not use background location, unless the user is expressly informed otherwise.

The user may disable the application's access to location data at any time in the device settings.

5. Is providing data mandatory?

Use of the basic functions of the Service does not require the user to provide identifying data.

Providing location data is voluntary, but refusal may make it impossible to use location-based functions.

Providing data in correspondence addressed to the Controller is voluntary, but it may be necessary in order to receive a reply or have a request handled.

6. Recipients of data

Data may be transferred to entities supporting the Controller in the maintenance and development of the Service, in particular providers of:

- a) hosting and IT infrastructure
- b) analytics and diagnostic tools
- c) mapping and location services
- d) communication and request-handling tools
- e) IT security services

Data are transferred only to the extent necessary to achieve the relevant purpose and on the basis of the appropriate legal grounds.

Where recipients process data on behalf of the Controller, they do so under appropriate agreements.

7. Transfers of data outside the European Economic Area

As a rule, the Controller seeks to ensure that data are processed within the European Economic Area.

However, if the use of external service providers results in the transfer of data outside the EEA, the Controller applies the safeguards required under applicable law, in particular appropriate legal safeguards.

Information on transfers outside the EEA may be provided to the user upon request where required by law.

8. Data retention period

Data are stored for the period necessary to achieve the purposes for which they were collected.

Data processed for the purpose of ensuring the operation and security of the Service may be stored for the period necessary for technical support, abuse detection, and the protection of claims.

Data processed on the basis of consent are stored until the consent is withdrawn or until the data are no longer useful for the purpose for which they were collected.

Data related to correspondence and complaints may be stored for the time necessary to handle the matter and for the limitation period applicable to potential claims.

9. User rights

The user has the right to:

1. access their data
2. rectify their data
3. erase their data
4. restrict processing
5. data portability – where provided for by law
6. object to processing – where provided for by law
7. withdraw consent at any time, without affecting the lawfulness of processing carried out before the withdrawal
8. lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych)

10. Cookies and similar technologies

The Controller may use cookies and similar technologies in the web part of the Service.

Detailed rules for their use are described in the Cookie Policy.

11. Data security

The Controller applies appropriate technical and organisational measures to protect personal data against unauthorised disclosure, loss, destruction, or unauthorised access.

The scope of the safeguards applied is adjusted to the nature of the data, the risks involved, and the current technical conditions.

12. Changes to the Privacy Policy

The Controller may amend this Privacy Policy in particular in the event of changes in law, changes in the Service's functionalities, or changes in the methods of data processing.

The amended version shall be published within the Service together with its effective date.

13. Contact

In matters related to the protection of personal data, the Controller may be contacted at: rafal.kazmierczak@uwm.edu.pl.

Effective date: 23 April 2026.