

Privacy Policy

Below, we provide detailed information regarding the personal data that will be processed when using the website www.motiontower.pl (the "**Website**") and the purposes for which such data will be processed. This Privacy Policy is based on 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 (GDPR).

The Website is operated by Apartamenty Towarowa 22 Sp. z o.o., with its registered office at ul. Chmielna 69, 00-801 Warsaw. Apartamenty Towarowa 22 Sp. z o.o., entered in the Register of Entrepreneurs of the National Court Register under KRS No. 630083, is a project company responsible for the implementation and development of the investment located in Warsaw at ul. Wronia 9, concerning apartments marketed under the name "Motion Tower" ("**Motion Tower**").

CHAPTER I PERSONAL DATA

When you use specific functionalities available on the Website, you provide your personal data. Below you will find detailed information on how your personal data is collected in connection with the functionalities available on the Website.

(a) Contact Form

The Website provides a contact form for submitting inquiries regarding the Motion Tower project and, where applicable, other projects carried out by Apartamenty Towarowa 22 Sp. z o.o.

(b) Newsletter / Sending Commercial Information by Electronic Means / and Telemarketing Activities (MMS/SMS or Telephone Calls)

The Website allows you to subscribe to the newsletter/request the sending of commercial information by electronic means/consent to telemarketing activities.

As part of the newsletter/commercial information and telemarketing activities, information will be sent/provided regarding the Motion Tower project and, where applicable, other real estate development projects carried out by Apartamenty Towarowa 22 Sp. z o.o., including offers and information concerning the implementation of such investments.

I. DATA CONTROLLER

1.1 The controller of personal data is **Apartamenty Towarowa 22 Sp. z o.o.**, with its registered office at ul. Chmielna 69, 00-801 Warsaw, entered in the Register of Entrepreneurs of the National Court Register under KRS No. 630083, whose registration files are maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register (the "**Controller**").

1.2 The Controller may be contacted:

- a)** by post, at the address indicated above,
- b)** by e-mail at: info@motiontower.pl.

1.3 Contact regarding data protection matters:

Matters relating to the protection of personal data are handled by a dedicated team, which may be contacted by e-mail at: dataprotection@afi.global.

II. SCOPE OF DATA PROCESSED

Depending on how the Website is used, the following data may be processed:

1.1. Contact Form:

- a)** first name,

- b) last name,
- c) e-mail address,
- d) telephone number,
- e) message content.

1.2. Newsletter / Sending Commercial Information / Telemarketing Activities:

- a) first name,
- b) last name,
- c) e-mail address,
- d) telephone number.

1.3. Data Collected Automatically (Cookies and Analytics Tools):

- a) IP address,
- b) cookie identifiers,
- c) browser and device data,
- d) data concerning activity on the Website,
- e) traffic source,
- f) approximate location (country / city).

III. DATA MINIMISATION PRINCIPLE

1.1 The Controller makes every effort to ensure that the scope of personal data processed is, in each case, limited to the minimum necessary and is adequate in relation to the purposes specified in this Privacy Policy.

1.2 The Controller processes only such data as is necessary to achieve the specified purposes.

IV. PURPOSES AND LEGAL BASES FOR DATA PROCESSING:

1.1 Response to an Inquiry (Contact Form)

Contact for the purpose of providing a response, presenting an offer, or continuing communication related to the inquiry.

Legal basis: Article 6(1)(b) of the GDPR – processing necessary in order to take steps at the request of the data subject prior to entering into a contract; in the case of inquiries that are not of a pre-contractual nature – Article 6(1)(f) of the GDPR – the Controller’s legitimate interest in handling inquiries.

1.2 Sending the Newsletter / Commercial Information by Electronic Means / Conducting Telemarketing Activities

Sending the Newsletter/commercial information by electronic means and/or conducting telemarketing activities concerning the Motion Tower project and, where applicable, other real estate development projects carried out by Apartamenty Towarowa 22 Sp. z o.o.

Legal basis: Article 6(1)(a) of the GDPR – consent.

Consent may be withdrawn at any time.

Each newsletter/commercial communication contains an appropriate link for this purpose.

1.3 Establishment, Exercise or Defence of Legal Claims

Processing of data for the purpose of establishing, exercising or defending legal claims.

Legal basis: Article 6(1)(f) of the GDPR – the Controller’s legitimate interest.

1.4 Analytical and Statistical Purposes

Analysis of how the Website is used for the purpose of:

- a) improving its functionality,
- b) optimising the user experience,
- c) measuring the effectiveness of advertising campaigns.

Legal basis: Article 6(1)(a) of the GDPR – consent (with respect to analytics and marketing cookies).

1.5 Marketing and Remarketing

Displaying personalised advertising content based on the user's activity.

Legal basis: Article 6(1)(a) of the GDPR – consent.

V. VOLUNTARY PROVISION OF DATA

1.1 Providing personal data is voluntary; however:

- a)** in the case of the newsletter/commercial information/telemarketing activities – it is necessary in order to receive such communications,
- b)** in the case of the contact form – it is necessary in order to receive a response,
- c)** in the case of analytics and marketing cookies – it depends on the consent granted.

1.2 Failure to provide the data may make it impossible to achieve the purposes indicated above.

VI. DATA RECIPIENTS

1.1 Your personal data may be disclosed to:

- a)** providers of IT and marketing services, in particular:
 - hosting service providers,
 - CRM system providers,
 - analytics tool providers (e.g. Google),
 - advertising tool providers (e.g. Google, Meta),
 - digital, marketing and media agencies;
- b)** public authorities – where the obligation to disclose data arises from applicable law.

1.2 The Controller does not sell or otherwise disclose personal data to third parties for their own marketing purposes.

VII. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

1.1 In connection with the Controller's use of Google and Meta tools, personal data may be transferred outside the European Economic Area.

1.2 Such transfers are carried out on the basis of:

- a)** Standard Contractual Clauses approved by the European Commission (as the primary safeguard), or
- b)** in the case of certified entities – an adequacy decision under the EU-US Data Privacy Framework.

VIII. DATA RETENTION PERIOD

1.1 Your personal data will be processed:

- a)** until you withdraw your consent to receive the Newsletter/commercial information and/or to be contacted for telemarketing purposes;
- b)** until the end of communication with you conducted on the basis of an inquiry submitted via the contact form, but no longer than 12 months from the date of the last contact;
- c)** for no longer than the applicable limitation periods for civil and criminal matters determined in accordance with applicable Polish law, insofar as your personal data is processed for the purpose of establishing, exercising or defending legal claims;
- d)** with respect to analytical data (cookies), for the period corresponding to the settings of the relevant tools, as indicated in Cookiebot.

IX. RIGHTS OF THE DATA SUBJECT

1.1 You have the right to:

- a) access your personal data,
- b) rectify your personal data,
- c) erase your personal data,
- d) restrict the processing of your personal data,
- e) data portability,
- f) object to the processing of your personal data,
- g) withdraw your consent at any time.

1.2 To exercise the rights referred to in point 1 above, please send an e-mail to: info@motiontower.pl. The Controller may request confirmation of your identity before fulfilling your request.

1.3 You have the right to lodge a complaint with the competent supervisory authority (in Poland, this is the President of the Personal Data Protection Office) if you consider that the processing of your personal data infringes the provisions of the GDPR.

X. AUTOMATED DECISION-MAKING

1.1 The Controller does not make decisions concerning you that produce legal effects or similarly significantly affect you in an automated manner.

1.2 The Controller uses tools such as Google Analytics, Google Ads and Meta Pixel to personalise content and advertisements based on user activity — solely after consent has been given through the cookie settings.

XI. CHILDREN

1.1 The Website is not intended for children under the age of 16.

1.2 The Controller does not knowingly collect personal data from children. If the Controller becomes aware that such data is being processed, it will be deleted without undue delay.

CHAPTER II COOKIES AND THIRD-PARTY TOOLS

1.1 The Website uses the Cookiebot tool and the Google Consent Mode v2 mechanism.

1.2 The user may:

- a) accept all cookies,
- b) reject cookies other than strictly necessary cookies,
- c) select individual settings (separately for analytics and marketing cookies).

1.3 The tools used include, among others:

- a) Google Analytics 4,
- b) Google Ads (remarketing),
- c) Meta Pixel.

1.4 Detailed information regarding cookies is provided in a separate Cookie Policy.

CHAPTER III FINAL PROVISIONS

1.1 The Website contains links to websites operated by third parties. Such websites may use cookies or offer services that require the provision of personal data.

1.2 The rules set out in this Privacy Policy apply exclusively to the Website.

1.3 When using other websites, you should also familiarise yourself with the privacy policies applicable to those websites.

1.4 This Privacy Policy may be updated periodically, in particular in the event of changes in applicable law, technological changes, or changes in the manner in which personal data is processed.

1.5 As users of the Website, you will be notified of any changes to this Privacy Policy at least 7 days before such changes take effect, by means of a notice published on the Website together with the updated version of the Privacy Policy, or, where justified, by means of direct communication. The exact effective date of the changes will be specified in each such notice.

COOKIE POLICY

This Cookie Policy sets out the rules governing the storage of and access to information on the User's device through cookies and similar technologies used in connection with the User's access to the website www.motiontower.pl (the "**Website**").

1. Who is the administrator of the Website?

The administrator of the Website is **Apartamenty Towarowa 22 Sp. z o.o.**, with its registered office at ul. Chmielna 69, 00-801 Warsaw, entered in the Register of Entrepreneurs of the National Court Register under KRS No. 630083, whose registration files are maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register (the "**Administrator**").

For matters concerning the processing of your personal data by the Administrator, please contact the Administrator by e-mail at: info@motiontower.pl.

2. What are cookies?

Cookies are small text files stored on the User's device while using the Website. They enable the Website to function properly and allow analysis of how the Website is used.

3. What types of cookies are used on the Website?

a) Strictly Necessary Cookies

These cookies are necessary for the proper functioning of the Website and do not require the User's consent. They include, among others:

- remembering privacy settings,
- ensuring the security of the Website.

b) Analytics Cookies

These cookies enable the analysis of how the Website is used and help optimise its performance.

Tool used: Google Analytics 4

Activated only after the given consent.

c) Marketing Cookies

These cookies enable the personalisation of advertising content and the measurement of campaign effectiveness.

Tools used:

- Google Ads: Search (brand + generic), PMax, Demand Gen + Google Analytics 4 (GA4)
- Meta Ads (Impressions, ThruPlay video, Traffic)

- LinkedIn Ads (Impressions, Traffic)
- DV360 (YouTube CTV, YouTube Sequencing) – programmatic video
- Programmatic display (Open + PMP) using data from JustTag
- Openweb/Adlook – Attention campaigns (video + display)
- IAS Attention Measurement

Activated only after the given consent.

4. Consent Management Mechanism

The Website uses Cookiebot and Google Consent Mode v2.

The User may:

- accept all cookies,
- reject cookies other than strictly necessary cookies,
- customise settings for individual categories (analytics / marketing).

Consent may be changed or withdrawn at any time through the cookie settings available on the Website.

5. Google Consent Mode v2

The Website uses Google Consent Mode v2, which enables Google tools (GA4, Google Ads) to adjust how they operate depending on the scope of consent granted.

If consent is not granted, these tools may operate in a limited mode (data modelling without identifying the User).

6. Cookie Retention Period

- a) Session cookies – deleted when the browser is closed.
- b) Persistent cookies – stored for the period specified in the relevant tool settings, as indicated in Cookiebot, or until they are deleted by the User.

7. Cookies and Other Third-Party Tools

When using the Website, cookies originating from third parties that process data on behalf of the Administrator may be stored on your device.

The Administrator's partners use cookies (and similar technological solutions) to monitor the effectiveness of advertising campaigns. This allows them to determine whether a particular advertisement has been displayed and to analyse responses to marketing communications.

If the User gives consent, entities cooperating with the Administrator may additionally use profiling for advertising purposes. This means that advertising content will be tailored to the User's interests based on their activity on the Website. Where such consent is granted, the information collected may also be shared with other advertising networks and advertising service providers for further online promotional activities. The Administrator cooperates with these entities in order to deliver relevant advertisements to the User both on the Website and on other websites.

The User decides whether cookies may be stored on his device. The User may consent to access to such information:

- a) through the cookie banner panel,
- b) by appropriately configuring the settings of their web browser.

The User has the right to refuse consent, limit its scope, or withdraw it entirely at any time (using the cookie banner options or browser settings).

List of third parties whose cookies are used on the Website:

- a) Google Ireland Limited,
- b) Meta Platforms Ireland Ltd.,
- c) Microsoft - Microsoft Advertising, Microsoft Clarity),
- d) Adobe Systems Software Ireland Limited,
- e) Amazon Web Services EMEA SARL,
- f) Fonticons. Inc.,

- g)** OpenJS Foundation,
- h)** Prospect One sp.z o.o.,
- i)** Usercentrics GmbH,
- j)** Alphabet Inc.,
- k)** LinkedIn Ireland Unlimited Company,
- l)** Openweb/Adlook,
- m)** JustTag Group.

8. Managing Cookies in Your Browser

The User may also manage cookies through their browser settings. Restricting the use of certain cookies may affect the functionality of the Website.

9. System Logs

Regardless of cookies, each time the User visits the Website, the Website automatically records on its servers certain information transmitted to the Administrator by web browsers. This information is stored in the form of logs containing:

- a)** the website from which you accessed our Website,
- b)** IP address,
- c)** date and time of access,
- d)** amount of data transferred,
- e)** information about the browser and operating system used.

This information is used in particular for the purposes of managing the Website, identifying and resolving server-related issues, analysing potential security breaches, as well as for statistical purposes.