

*The privacy policy as follows is effective as of November 30.2021.
A link to the previous version is provided at the end.*

Dear Customer.

The following is my "Privacy Policy", in which I describe the rules for the processing of your personal data and the use of cookies and other tracking technologies related to the use of the website www.toddleroad.com.

Who is the administrator of personal data?

The administrator of the website and the Administrator of your personal data is: Kamil Renczewski doing business under the name MakByte Kamil Renczewski, NIP:5262845505, REGON: 146923970, registered in Bielsko-Biała, 12 Prof. Dr. M. Michalowicza St., 43-300. email address: contact@toddleroad.com, hereinafter referred to as "Administrator".

If you have any doubts about the privacy policy, you can contact the Administrator at any time by sending a message to contact@toddleroad.com.

Who can you contact about personal data?

You can contact the Administrator about matters related to data protection and privacy in general at the e-mail address contact@toddleroad.com.

Who is a User of the Website?

Users of the Website are its customers, i.e. persons using the services provided by the Administrator through the Website, as defined in the Terms and Conditions of the Toddleroad Store (the "Terms and Conditions").

This Privacy Policy is an integral part of the Terms and Conditions.

What information do I have about you?

Depending on the purpose for which you use the website, store or social media, I may process the following information about you:

- first and last name,
- residential address,
- business address,
- tax identification number,
- email address,
- telephone number,
- data contained in e-mail correspondence,
- details of orders placed in the store,
- bank account number,
- IP address,
- approximate location,
- image (social media profile picture),
- statistics related to newsletters received,
- content of comments added on Facebook and Instagram.

The scope of the processed data is different for each processing purpose, which is described in more detail later in this policy.

The Administrator uses tools and also, which collect a range of information about you related to the use of the website www.toddleroad.com.

In particular, this includes the following information:

- about your operating system and web browser,

- subpages viewed,
- time spent on the site,
- transitions between individual subpages,
- clicks on individual links,
- the source from which you go to the site,
- the age range you are in,
- Your gender,
- Your approximate location limited to your locality.
- Your interests as determined by your online activity.

This information is referred to hereafter in this privacy policy as "Anonymous Information".

Anonymous Information by itself is not personal information because it does not allow me to identify you and I do not collate it with the typical personal information I collect about you.

Anonymous Information is collected by third-party tools I use (Google Analytics, Facebook Custom Audiences, Facebook Connect, YouTube), Anonymous Information is also processed by tool providers under the terms of their terms of use and privacy policies.

The processing of Anonymous Information allows us to provide you with the ability to use the YouTube embedded in website pages. In addition, Anonymous Information is used for analytics and statistical and marketing purposes (creating Custom Audience Groups on Facebook, setting up, targeting and directing ads).

Anonymous Information is also used by providers of particular tools to provide and improve services, manage services, develop new services, measure the effectiveness of advertisements, protect against fraud and abuse, and personalize content and ads displayed on particular services, sites and applications.

Where do I get your personal information from?

Most of your data. Personal information is provided to me by you when:

- you place an order in the online store,,
- you sign up for a newsletter (Lead Magnet),
- you contact me via email,
- you observe my social media profiles or interact with content published by me on social media.

Some of the information about you may be automatically collected by the tools I use:

- the mechanism of the online store and the newsletter system collect your IP address,
- the newsletter system mechanism collects information about your activity in relation to the content sent to you as part of the newsletter, such as opening messages, clicking on links, etc,
- Facebook Custom Audiences, including Facebook Pixel, Google Analytics, Facebook Connect, YouTube, SoundCloud and Disqus collect Anonymous Information related to your activities on the site;

Is Your data safe?

The Administrator cares about the security of your personal data. All risks associated with their processing and storage have been analyzed, and appropriate security and data protection measures have been implemented.

The state of the technical infrastructure is monitored on an ongoing basis, all persons with access to personal data are properly trained and authorized.

If you have any questions about your personal data, please contact me: contact@toddleroad.com

For what purposes do I process your personal data?

1. Fulfillment of tax and accounting obligations - Article 6(1)(c) of the DPA in connection with relevant tax laws,
2. Creation of an archive for the possible need to defend, establish or assert claims, as well as to update purchased documents - Article 6(1)(f) RODO,
3. Creation of Facebook audience groups - Article 6(1)(f) RODO,
4. Social media maintenance - Article 6(1)(f) RODO,
5. Analysis and statistics using only Anonymous Information - Article 6(1)(f) RODO,
6. Self-marketing using only Anonymous Information - Article 6(1)(f) RODO,
7. Ensuring the operation of the YouTube and SoundCloud player, social plugins and Disqus comments using only Anonymous Information - Article 6(1)(f) RODO.
8. Orders - details

When placing an order, you will need to provide the data necessary to process the order: email address, name, invoice details.

In addition, the system used to handle the order process records your IP number, which you used when placing the order.

Each order is recorded in a database, which means that your personal data assigned to the order is also accompanied by order information such as the date and time of the order, the order ID number, the transaction ID, the subject of the order, the price, the method and date of payment, the date and time of downloading the purchased digital content.

Data collected in connection with an order, are processed for:

execution of the contract concluded by placing an order (Article 6(1)(b) RODO),

issuing an invoice (Article 6(1)(c) RODO in connection with the relevant regulations governing the issuance of invoices),

inclusion of the invoice in the accounting records and fulfillment of other tax and accounting obligations (Article 6(1)(c) RODO in connection with the relevant regulations governing tax and accounting obligations),

inclusion in an archive for the possible need to defend, establish or assert claims, as well as to ensure the updating of purchased documents, which is a legitimate interest pursued by the administrator (Article 6(1)(f) RODO).

Order data is processed for the time necessary to process the order, and then until the expiration of the statute of limitations for claims under the concluded contract.

In addition, after the expiration of this period, the data may continue to be stored for archival purposes to ensure that the purchased documents are updated.

Remember also that I am required to keep accounting records, which may contain your personal data, for the period required by law.

9. Newsletter (Lead Magnet) - details

By subscribing to the newsletter, you provide your name and email address. Providing data is voluntary, but necessary to subscribe to the newsletter.

The system used to handle the newsletter [see www.mailerlite.com for more information], records your IP number you used when signing up for the newsletter, determines your approximate location, the mail client you use for email. Accordingly, I also have information about which messages you opened, within which messages you clicked on links, etc.

The data provided by you in connection with signing up for the newsletter, is used for the purpose of sending you the newsletter, and the legal basis for its processing is your consent (Article 6(1)(a) RODO) given when signing up for the newsletter.

The processing of information that does not come from you, but is collected automatically by the mailing system, is justified on the basis of my legitimate interest (Article 6(1)(f) RODO) in analyzing the behavior of newsletter subscribers in order to optimize mailing activities.

You can unsubscribe from the newsletter at any time by clicking on the designated link in each message sent as part of the newsletter or by simply contacting the Administrator.

Despite unsubscribing from the newsletter, your data will still be stored in the database in for the identification of the returning subscriber and the possible defense of claims related to the sending of the newsletter to you, in particular for the purpose of proving the fact that you gave your consent to receive the newsletter and the moment of its withdrawal, which is my legitimate interest referred to in Article 6(1)(f) of the RODO.

You can modify your data provided for the purpose of receiving the newsletter at any time by clicking on the relevant link visible in each message sent as part of the newsletter, or by simply contacting me.

10. Mail handling - details

When contacting me via e-mail, you naturally provide your personal data contained in the content of the correspondence, in particular your e-mail address and name. Provision of data is voluntary, but necessary to establish contact.

Your data is processed in this case for the purpose of contacting you, and the basis for processing is Article 6(1)(f) of the RODO, i.e. my legitimate interest. The legal basis for post-contact processing is also my legitimate interest in archiving correspondence for the purpose of ensuring that I can prove certain facts in the future (Article 6(1)(f) RODO).

The content of the correspondence may be subject to archiving and I am not able to clearly determine when it will be deleted. You have the right to request the history of correspondence you have had with me (if it was subject to archiving), as well as to request its deletion, unless its archiving is justified by my overriding interests, such as defense against potential claims on your part.

11. Tax and accounting obligations - details

Each VAT invoice issued into the accounting records, which will be kept for the period of time required by law. Your personal data is then processed for the purpose of fulfilling my tax and accounting obligations (Article 6(1)(c) of the RODO in connection with the relevant regulations governing tax and accounting obligations).

12. Archive - details

As part of the description of the various purposes for processing personal data above, I have indicated the deadlines for storing personal data. These terms are often related to the archiving of certain data for the purpose of ensuring that we can prove certain facts in the future, reconstruct the course of cooperation with the customer, exchanged correspondence, defense, establishment or assertion of claims, updating of purchased documents. I am relying in this regard on my legitimate interest referred to in Article 6(1)(f) of the RODO.

13. Audience groups - details

Your email address stored in the newsletter database or in the online store database can be sent to Facebook to create an audience group for advertisements using that email address.

When using this feature, the email address after it is sent to Facebook is hashed to create an audience group.

The email address will be used in the matching process conducted by Facebook.

Facebook does not share the email address with third parties or other advertisers and deletes the email address immediately after the matching process is completed.

Facebook has implemented processes and procedures to ensure the confidentiality and security of the email address sent to it and the set of Facebook user IDs that make up the audience created using the email address by, among other things, applying technical and physical safeguards.

The creation of a Facebook ad audience using your email address constitutes my legitimate interest as referred to in Article 6(1)(f) of the RODO.

You can object to the use of your email address for this purpose at any time, just write to me about it at contact@toddleroad.com.

14. Social Media - details

If you follow ToddleRoad's social media profiles or interact with content published by me on social media, I naturally see your data that is publicly available on your social media profile. I process this data only within the respective social network and only for the purpose of operating the respective social network, which is my legitimate interest as referred to in Article 6 (1) (f) of the RODO.

Your use of social networking sites is subject to the rules and privacy policies of the administrators of those sites, and those administrators provide electronic services to you, fully independently and autonomously from me.

15. Analytics and statistics - details

I use Google Analytics and Facebook Pixel to perform analytical and statistical activities. Within the analytical tools, I only have access to Anonymous Information.

I base the processing of Anonymous Information on the legitimate interest referred to in Article 6(1)(f) of the RODO. The legitimate interest is to create, review and analyze statistics related to user activity on the blog in order to draw conclusions that allow for subsequent optimization of the website.

Details related to Google Analytics are provided within the section dedicated to this tool when describing cookies. Facebook Pixel functions within cookies detected as Facebook Custom Audiences, so details related to it are presented within the section dedicated to Facebook Custom Audiences when describing cookies.

I do not have the ability to grant access to Anonymous Information about you, as I am not able to assign any of the Anonymous Information to any specific user. From Google Analytics and Facebook tools, I only have access to a set of statistics and information not attributed to specific individuals.

16. Custom marketing - details

I run marketing activities using Facebook Custom Audiences, including Facebook Pixel and also Google Ads, including Google Analytics. As part of the marketing tools, I only have access to Anonymous Information.

I process Anonymous Information on the basis of legitimate interest referred to in Article 6(1)(f) of the RODO. The legitimate interest consists of creating Custom Audience Groups based on Anonymous Information and targeting Facebook ads based on Anonymous Information, both of which fall within the marketing of my own products and services.

Details related to Facebook Custom Audiences are provided within the section dedicated to this tool when describing cookies.

I am not able to provide you with access to Anonymous Information about you, as I am not able to assign any of the Anonymous Information to any specific user. From the Facebook tools, I only have access to a set of statistics and information not assigned to specific individuals.

How long will I keep your personal information?

Data retention periods are indicated separately for each processing purpose above.

I draw your attention to the fact that I have adopted a model of storing your order data for the entire period of my business. I conclude that this works to your benefit, as you can reconstruct your purchase history at any time and benefit from updates to your purchased documents.

However, if you do not want your order data to be stored for such a long time, you can object to its storage for the described purpose at any time. However, I inform you that I see my overriding interest in storing your order data until the expiration of the statute of limitations for claims under the concluded contract.

Who are the recipients of your personal data?

Third-party service providers that are involved in the processing of your personal data are:

- the hosting provider, which stores the data on the server,
- a cloud service provider [Google], where files that may contain your personal data are stored,
- the provider of a mailing system where your data is stored if you are a newsletter subscriber,
- provider of an invoicing system where your data is stored for the purpose of invoicing,
- the provider of maintenance services that accesses your data if the technical work carried out relates to the areas where your personal data is stored,
- other subcontractors who gain access to the data if the scope of their activities requires such access.

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

If the need arises, your data may be made available to a legal counselor or attorney bound by professional secrecy. The need may arise from the need for legal assistance requiring access to your personal data.

In addition, in terms of handling electronic correspondence, legal advisors, attorneys or lawyers other than me may be involved in the processing.

Your personal data may also be transferred to the tax authorities to the extent necessary for the fulfillment of tax and accounting obligations, in particular, these are any declarations, reports, statements and other accounting documents that contain your personal data.

Your personal data may also be shared with entities, authorities or institutions authorized to access the data under the law, such as police, security services, courts, prosecutors.

With respect to Anonymous Information, access is granted to providers of tools or plug-ins that collect Anonymous Information. The providers of these tools are independent controllers of the data collected in them, and may share this data under the terms of their own regulations and privacy policies, which are beyond my control.

Do I transfer your data to third countries?

Some of the processing operations of your personal data may involve their transfer to third countries.

These are situations that involve the use of tools that store personal data on servers located in third countries, particularly in the USA. Providers of these tools guarantee an adequate level of personal data protection through the relevant compliance mechanisms provided for by the RODO, in particular through the use of standard contractual clauses.

The storage of personal data on servers located in third countries occurs within the following tools:

MailerLite Limited's mailing system, Ground Floor, 71 Lower Baggot Street, Dublin 2, D02 P593, Ireland - in terms of your name, email address, IP address and statistical information related to your reactions to the messages sent.

MailerLite Limited ensures an adequate level of protection of personal data by applying the compliance mechanisms provided for by the RODO, in particular through the use of standard contractual clauses.

Do I use profiling?

The Administrator does not take actions against you that are based on automated processing, including profiling, that would produce legal effects against you or similarly significantly affect you.

However, the Administrator uses tools that may take certain actions depending on the information collected through tracking mechanisms.

- Within the tools I use, I do not have access to information that would allow me to identify you. The information I am referring to here is, in particular:
- information about the operating system and web browser with which you visit toddleroad.com,
- the sub-pages of the toddleroad.com website that you view,
- time spent on the toddleroad.com website,
- transitions between different subpages of the toddleroad.com website,
- the source from which you go to the aforementioned site,
- the age range you are in,
- your gender,
- Your approximate location limited to locality,
- Your interests as determined by your online activity.

The aforementioned information is not compiled with your personal information, which is in my databases. This information is anonymous and does not allow me to identify you. This information is stored on the servers of the providers of the respective tools, and these servers can most often be located around the world.

What rights do you have in relation to data processing?

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

- The right to access your data and to receive a copy of it,
- The right to rectify (amend) your data,
- The right to erasure (if, in your opinion, there are no grounds for me to process your data, you can demand that I erase it),
- The right to restrict the processing of your data (you can request that I restrict the processing of your data only to the storage of your data or the performance of activities agreed with you, if in your opinion I have inaccurate data or I am processing it unfoundedly),
- The right to object to data processing (you have the right to object to data processing on the basis of legitimate interests; you should indicate the particular situation that you think justifies the cessation of processing covered by the objection; I will stop processing your data for these purposes unless I demonstrate that the grounds for my processing override your rights or that your data are necessary for us to establish, assert or defend claims),
- the right to data portability (you have the right to receive from me in a structured, commonly used machine-readable format the personal data you have provided to me on the basis of a contract or your consent; you can instruct me to send this data directly to another entity),
- The right to withdraw your consent to the processing of personal data, if you have previously given such consent,

- The right to lodge a complaint with a supervisory authority (if you find that I am processing your data unlawfully, you may file a complaint to this effect with the President of the Office for Personal Data Protection or other competent supervisory authority).

You may also at any time request the Administrator to provide you with information about what data it holds about you and for what purposes it processes them. Please direct any questions to: contact@toddleroad.com

Do I use cookies and what are they actually?

The website, www.toddleroad.com, uses cookies.

Cookies are small textual information stored on your terminal device (e.g. computer, tablet, smartphone), which can be read by my ICT system (own cookies) or third-party ICT systems (third-party cookies). Cookies may record and store certain information, which ICT systems can then access for specific purposes.

Some of the cookies I use are deleted when the browser session ends, i.e. when you close it (so-called session cookies). Other cookies are retained on your terminal device and allow your browser to be recognized the next time you visit the site (persistent cookies).

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Some of the cookies I use are deleted when the browser session ends, i.e. when you close it (so-called session cookies). Other cookies are retained on your terminal device and allow your browser to be recognized the next time you visit the site (persistent cookies).

On what basis do I use cookies?

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

During your first visit to my site, I display a message to you indicating that we use cookies.

Please note that disabling or restricting cookies may prevent you from using some of the features available on my website and may cause difficulties in using the website, as well as many other websites that use cookies. For example, if you block cookies of social networking plug-ins, buttons, widgets and social features implemented on the site may not be available to you.

Can you disable cookies?

You can manage your cookie settings within your web browser. You can block all or selected cookies. You can also block cookies of specific sites. You can also delete previously saved cookies and other site and plug-in data at any time.

Web browsers also offer the possibility to use incognito mode. You can use it if you do not want information about the sites you have visited and the files you have downloaded to be saved in your browsing and download history. Cookies created in incognito mode are deleted when you close all windows in this mode.

There are also browser plug-ins available to control cookies, such as Ghostery. The option to control cookies may also be provided by additional software, in particular antivirus 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.

Please note that disabling or restricting cookies may prevent you from using some of the features available on my website and cause difficulties in using the site, as well as many other websites that use cookies. For example, if you block cookies of social networking plug-ins, buttons, widgets and social features implemented on my site may not be available to you.

For what purposes do I use proprietary cookies?

Proprietary cookies are used to ensure the proper functioning of the various mechanisms of the site, such as remembering the contents of the shopping cart for a certain period of time after adding selected products to it, proper submission of forms visible on the site, etc.

Own cookies also store information about your defined cookie settings made from the mechanism for managing cookies.

What third-party cookies are used?

The following third-party cookies operate within the www.toddleroad.pl website:

1. Facebook Custom Audiences,
2. Facebook Connect and other social media plugins,

Facebook Custom Audiences - details

As part of the Facebook Ads system provided by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA, I use the Custom Audiences feature to target specific groups of users with targeted advertising messages. I perform activities in this regard based on my legitimate interest in marketing my own products or services.

In order to target you with ads personalized to your behavior on my site, I have implemented a Facebook Pixel within the site, which automatically collects information about your use of my site. The information collected in this way is transmitted to Facebook's servers, which may be located around the world, particularly in the United States of America (USA).

The information collected as part of Facebook Pixel is anonymous, i.e. it does not allow me to identify you. Depending on your activity on my site, you may end up in a certain audience, but I do not in any way identify individuals belonging to these groups.

The Facebook Pixel may track and record, among other things, the following of your behaviors:

viewing the content of a specific page,
proceeding to checkout within an online store,
finalizing a purchase within a blog store,
filling out a specific form, such as signing up for a newsletter.

I inform you, however, 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. Such actions by Facebook are no longer up to me, and you can look for information about them directly in Facebook's privacy policy. From your Facebook account, you can also manage your privacy settings. Here you will find useful information in this regard.

Facebook Connect and other social plugins - details

My website uses plug-ins, buttons and other social media tools, collectively referred to as "plug-ins", provided by social networks such as Facebook, Instagram, LinkedIn, Twitter.

When you view a web page containing a plug-in of a particular social network, your browser sends information to the administrator of that social network about your visit. Since the plug-in is a piece of the social network embedded in my site, the browser sends information about the request to download the content of a particular social network to my site.

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

The social network administrators use some of this information to personalize the viewing experience on my site. For example, when you visit a page with a "Like" button, the social network

administrator needs information about who you are in order to show you which of your friends also like my page.

Information collected by plugins may also be used by social network administrators for their own purposes, such as improving their own products, creating user profiles, analyzing and optimizing their own activities, and targeting advertisements. I have no real influence on how the information collected by the plugins is then used by the social network administrators. You can look for details in this regard in the rules and privacy policies of individual social networks.

Social network plug-ins collect and transmit information to social network administrators even when you browse my site without being logged into your social network account. Then, however, the browser sends a more limited set of information.

If you have logged in to one of the social networks, the administrator of the site will be able to directly attribute your visit to my site to your profile on that social network.

If you do not want the social network to attribute the data collected from your visit to my site directly to your profile on a particular social network, then you must log out of that social network before visiting my site. You can also completely prevent plug-ins from loading on the site by using the appropriate extensions for your browser, such as script blocking.

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

As for details related to the processing by social media administrators of information collected by plug-ins, in particular the purpose and scope of data collection and its further processing and use by the administrators, as well as the possibility of contacting you and your rights in this regard and the possibility to make settings to ensure the protection of your privacy, you will find everything in the privacy policies of the respective service providers:

Facebook,
Instagram.

Do I track your behavior undertaken on my website?

Yes, I use Google Analytics and Facebook Custom Audiences tools, which involve collecting information about your activities on my website. These tools are described in detail within the question on third-party cookies, so I will not repeat that information here as well.

Do I target you with targeted ads?

Yes, I use Facebook Ads and Google Ads, where I can target ads to specific groups defined based on various criteria such as age, gender, interests, profession, job, activities previously undertaken on my site. These tools are described in detail within the question on third-party cookies, so I will not repeat that information here as well.

How can you manage your privacy?

You can manage your privacy using:

- cookie settings within your web browser,
- browser plug-ins that support cookie management, e.g. Ghostery,
- additional software that manages cookies,
- incognito mode in your web browser,
- behavioral advertising settings, e.g. youronlinechoices.com,

Is this privacy policy subject to change?

Yes, the privacy policy is subject to change, in particular due to technological changes and changes in legislation.

Archived version of the privacy policy in effect until 29/11/2021.