

PRIVACY AND COOKIES POLICY

Privacy and Cookies Policy

Effective from 21 September 2026

Service Provider / Controller	Jakub Zawadzki
Short name	PVPSMURF
Address	Mrowla 14A, 36-054 Mrowla
Tax ID (NIP)	5170475667
Business registry ID (REGON)	545733060
Email	bezrobocie.kontakt@gmail.com
Website	bezrobocie.gg
Discord	https://discord.gg/X3prSZMVCd

§1. Personal data controller

1. The personal data controller is Jakub Zawadzki, whose contact and identification details are provided on the first page of this Policy.
2. For matters concerning privacy and data protection, the Controller can be contacted at bezrobocie.kontakt@gmail.com.
3. The Controller has not appointed a Data Protection Officer, unless such an obligation arises in the future.

§2. Categories of personal data processed

Depending on how the Website is used, the Controller may process, in particular:

- Minecraft nickname and other Player Account identifiers.
- Email address and contact details provided by the User.
- IP address and technical information about the device, browser and connection.
- Order details, value, date, status and transaction identifier.
- Billing details necessary for issuing accounting documents.
- The content of correspondence, complaints and reports.
- Information about consent and the versions of the Terms and Conditions and Policy accepted when placing an order.
- Security data and technical logs necessary to protect the Website and Server.

§3. Purposes and legal bases for processing

Purpose	Legal basis
Conclusion and performance of the contract and fulfilment of a Top-up	Article 6(1)(b) GDPR
Order handling and contact relating to the contract	Article 6(1)(b) GDPR
Tax and accounting obligations	Article 6(1)(c) GDPR
Handling complaints and the User's statutory rights	Article 6(1)(b) and (c) GDPR - depending on the basis of the obligation
Ensuring Website and Server security and detecting abuse	Article 6(1)(f) GDPR - the Controller's legitimate interest
Establishing, pursuing or defending claims	Article 6(1)(f) GDPR
Contact before conclusion of the contract	Article 6(1)(b) GDPR or Article 6(1)(f) GDPR - depending on the nature of the message
Optional analytics or marketing cookies, if implemented	User consent - Article 6(1)(a) GDPR and the applicable provisions concerning storage of information on the user's device

§4. Service providers and recipients of data

Data may be disclosed to entities supporting the Controller in operating the Website and Server, only to the extent necessary for the relevant purpose. These may include, in particular:

- OVHcloud - the hosting infrastructure provider for the bezrobocie.gg website.
- Hetzner - the server infrastructure provider used to operate the Minecraft server.
- CashBill S.A. - the payment operator; in providing its services, it may process data in accordance with its own terms and conditions and privacy policies.
- Google - the provider of the Gmail email service used to contact Users.
- Discord - if the User contacts the Controller via Discord or uses the community server.
- Providers of IT, security, backup, accounting or legal assistance services, where use of such services is necessary.
- Authorised public authorities - only where an appropriate legal basis exists.

Not every entity listed above receives all categories of data. The scope of disclosure depends on the function of the service concerned and the actual technical configuration.

§5. Hosting and technical logs

4. The bezrobocie.gg website is hosted on OVHcloud infrastructure. When handling connections, the server may automatically record, among other things, the IP address, connection date and time, requested resource, browser type and error information.

5. The Minecraft server operates on Hetzner infrastructure. Server logs, player identifiers, IP addresses and information about connections to the Server may be processed to ensure operation and security, prevent abuse and diagnose problems.
6. Logs are used only to the extent justified by security, diagnostics, performance of the contract or pursuing claims.

§6. Payment operator

7. Payments in the Shop are handled by CashBill S.A.
8. The Controller does not receive online banking passwords or full payment card details where they are entered directly into the payment operator's system.
9. CashBill may act as a separate data controller in respect of activities arising from payment services regulations and its own legal obligations.

§7. Data retention periods

10. Data necessary for performance of the contract is retained for the duration of its performance and subsequently for the period necessary to establish, pursue or defend claims.
11. Accounting or tax documents and data are retained for the period required by the applicable regulations.
12. Data contained in complaints and correspondence is retained for the time needed to handle the matter and subsequently for the period necessary to protect claims.
13. Security logs may be retained for a period justified by the need to prevent abuse, analyse incidents and protect the Website.
14. Data processed on the basis of consent is processed until consent is withdrawn or until the data is no longer needed for the purpose for which consent was given.

§8. Rights of the data subject

Subject to the conditions laid down in the GDPR, the User may have the right to:

- Access their data and receive a copy.
- Rectify their data.
- Have their data erased.
- Restrict processing.
- Data portability.
- Object to processing based on legitimate interests.
- Withdraw consent at any time where processing is based on consent, without affecting the lawfulness of earlier processing.
- Lodge a complaint with the President of the Polish Personal Data Protection Office (UODO).

To exercise these rights, contact bezrobocie.kontakt@gmail.com. The Controller may request information to verify the identity of the person making the request where this is necessary to protect personal data.

§9. Voluntary provision of data

15. Providing the data required when placing an order is voluntary but necessary to conclude and perform the contract.
16. Failure to provide the data required to fulfil an order may prevent its fulfilment.
17. Providing invoice details is necessary if the User requests a document requiring such details.

§10. Automated decision-making

As of the effective date of this Policy, the Controller does not use data for automated decision-making that produces legal effects concerning the User or similarly significantly affects them. If such functionality is introduced, the Policy will be updated accordingly.

§11. Transfers of data outside the European Economic Area

18. Some providers used by the Website, in particular providers of global communication or email services, may process data outside the European Economic Area.
19. Where such a transfer occurs, the Controller uses providers that declare the use of mechanisms permitted by the GDPR for lawful transfers, such as a European Commission adequacy decision or standard contractual clauses, to the extent applicable to the service concerned.
20. The scope and location of processing may depend on the current configuration of OVHcloud, Hetzner, Google, Discord and CashBill services.

§12. Cookies and similar technologies

21. The Website may use cookies and similar technologies to ensure the correct and secure operation of the website, maintain sessions, support the purchasing process and remember privacy settings.
22. Technically necessary cookies may be used without consent to the extent permitted by applicable law.
23. Analytics cookies, advertising cookies or other optional tracking technologies should not be activated before the appropriate User consent has been obtained.
24. If the Website does not use analytics or advertising tools, the cookie banner may be limited to information about the use of necessary cookies and provide access to this Policy.
25. If Google Analytics, Meta Pixel, TikTok Pixel or other similar tools are introduced in the future, this Policy and the configuration of the consent mechanism must be updated before they are activated.

§13. Managing cookie consent

26. If the Website uses optional cookies, consent to them must not be selected by default.
27. The User should be able to accept all optional cookies, reject them or make a detailed selection.
28. The User should be able to change or withdraw consent at any time using the "Cookie settings" function available on the Website.
29. Refusal to consent to optional cookies should not prevent use of the basic Shop features.

§14. Data security

30. The Controller applies appropriate technical and organisational measures proportionate to the nature of the data and the risks, in particular HTTPS transmission encryption, system access control, software updates, restriction of permissions and backups to the extent justified by the Website's operational needs.
31. The User should protect their own accounts and devices and must not disclose authentication credentials to third parties.

§15. Contact via Discord and email

32. If the User contacts the Controller via Gmail or Discord, the data contained in the message is also processed by the relevant service provider in accordance with its own privacy policy.
33. For complaints, withdrawal from the contract and requests concerning personal data, the recommended email address is bezrobocie.kontakt@gmail.com, which is the primary formal contact channel.

§16. Changes to the Policy

- 34.** The Policy may be updated following changes in the law, the operation of the Website, the providers used or the introduction of new technologies.
- 35.** The current version of the Policy is published on the Website together with its effective date.
- 36.** The introduction of a new analytics, advertising or external login tool, or another provider processing data, should be preceded by verification and, where necessary, an update to this Policy.

Annex - recommended cookie banner configuration

If the Website uses only necessary cookies:

"We use necessary cookies to ensure that the Shop operates correctly and securely. You can find details in the Privacy and Cookies Policy."

If the Website introduces analytics or marketing cookies, the banner should contain equally prominent options: "Accept all", "Reject optional" and "Settings". Optional categories should be disabled by default.