

Mobile App Privacy Policy

Kolega eSIM application · Last updated: 28 July 2026

The Kolega eSIM mobile application (hereinafter referred to as the „Application”) will enable you to control your mobile Internet service in eSIM technology.

In connection with the installation of the Application by you on a mobile device, an agreement for the provision of services by electronic means within the meaning of the provisions of the Act of 18 July 2002 on the provision of services by electronic means is concluded between you and the provider of the Application. This Privacy Policy is intended to provide you with information on how your personal data is processed in connection with this, as well as how your personal data is processed in connection with our marketing activities.

The purpose of the Privacy Policy is to provide you with the information referred to in Article 13 of 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 (General Data Protection Regulation), hereinafter referred to as the „GDPR”. The privacy policy is informative and does not entail any obligations for you (it is not a regulation or a contract).

Who is the administrator of your personal data?

The administrator of your personal data is **Sanil Limited**, 46 The Priory Queensway, Birmingham, United Kingdom, B4 7LR, e-mail: kontakt@sanil.pl, tel. +48 783 287 488.

For any data protection issues, you can contact us by e-mail at kontakt@sanil.pl or by post at 46 The Priory Queensway, Birmingham, United Kingdom, B4 7LR.

How do we keep your personal data safe?

- Your personal data is processed in accordance with the GDPR and other currently applicable provisions of the law on the protection of personal data.
- We use technical and organizational measures required by national and EU law to ensure the protection of processed personal data and to protect personal data against their disclosure to unauthorized persons, takeover by unauthorized persons, processing in violation of the law, and change, loss or destruction.
- Providing personal data is voluntary, but necessary to use the functionalities of the Application that require it.

- In a situation where consent is the basis for the processing of personal data, the lack of such consent will prevent us from taking the action to which this consent relates. You can withdraw your consent at any time, however, this will not affect the lawfulness of our processing of your personal data that we have made on the basis of your consent before its withdrawal.

For what purpose and on what basis do we process your personal data and how long will we store it?

We process your personal data in particular for the purpose of providing electronic services within the scope of the Application within the meaning of the provisions of the Act of 18 July 2002 on the provision of services by electronic means. We process your personal data in order to:

1. Electronic services

Your personal data provided by you or other data collected in connection with the download and installation of the Application and thus the provision of services by electronic means, are or may be processed by us for the following purposes and on the following legal bases:

- provision of services by electronic means, on the basis of a contract for the provision of services by electronic means, as well as taking actions, at your request, prior to the conclusion of the above-mentioned agreement (Article 6(1)(b) of the GDPR),
- possible determination, exercise or defence against claims that may arise in connection with your use of our App, as well as other purposes (e.g. archiving for the purpose of proving facts) that constitute our legitimate interest (Article 6(1)(f) of the GDPR),
- issuing and storing accounting documents and handling any complaints, in accordance with the applicable regulations (Article 6(1)(c) of the GDPR).

We will process your personal data for the period of providing services by electronic means, unless further storage of data is justified by the limitation period for claims or results from generally applicable provisions of law or is justified by our overriding interest resulting from the pursuit of legitimate interests. In any case, the longer period for storing personal data is decisive.

2. Marketing and analytics

Your personal data provided by you or other data collected in connection with your use of our App is or may be processed by us for the following purposes and on the following legal bases:

- marketing of our services, which constitutes our legitimate interest in conducting marketing activities (Article 6(1)(f) of the GDPR), with the proviso that the transmission of commercial information by us using telecommunications terminal equipment and automatic calling systems is possible only with your prior consent (granting this consent is voluntary, but necessary for the transmission of commercial information); in this case, your consent may also be the basis for the processing of personal data (Article 6(1)(a) of the GDPR),

- tracking the installation of the Application, creating statements, analyses and statistics, including reporting, planning the development of services, development works, creating statistical models, which constitutes our legitimate interest in improving and developing the Application (Article 6(1)(f) of the GDPR),
- possible determination, exercise or defence against claims that may arise in connection with your use of our App, as well as other purposes (e.g. archiving for the purpose of proving facts) that constitute our legitimate interest (Article 6(1)(f) of the GDPR).

In the case of marketing activities carried out on the basis of consent, we will process your personal data until its withdrawal, and in the case of marketing activities carried out on the basis of the premise of legitimate interest until the objection is raised, unless further storage (in both cases) of the data is justified by the limitation period for claims or results from generally applicable provisions of law or is justified by the overriding interest of the Administrator resulting from the pursuit of legitimate interests.

3. E-mail or telephone contact

Your personal data provided by you in connection with e-mail or telephone contact (i.e. data necessary to establish and maintain contact), as well as collected in the course of further communication, are or may be processed by us for the following purposes and on the following legal bases:

- responding to e-mail or telephone contact, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR),
- taking action at your request prior to concluding the contract, if the communication will be conducted (Article 6(1)(b) of the GDPR),
- possible findings, investigations or defence against claims that may arise in connection with your contact by e-mail or telephone, as well as other purposes (e.g. archiving for the purpose of proving facts) that constitute our legitimate interest (Article 6(1)(f) of the GDPR).

We will process your personal data until the correspondence is conducted, unless further storage of data is justified by the limitation period for claims or results from generally applicable provisions of law or is justified by the overriding interest of the Administrator, resulting from the pursuit of legitimate interests. In any case, the longer period for storing personal data is decisive.

What rights do you have?

In connection with our processing of your personal data, you have a number of rights. You can exercise any of the rights by contacting us by e-mail at kontakt@sanil.pl or by letter to: 46 The Priory Queensway, Birmingham, United Kingdom, B4 7LR. You are entitled to:

- access to your personal data and the right to request their rectification, deletion and restriction of processing. To the extent that the basis for the processing is the premise of our legitimate interest, you have the right to object to the processing of your personal data,

- to the extent that consent is based on the processing of your personal data, you have the right to withdraw your consent. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal,
 - to the extent that the basis for the processing of your personal data is consent or a contract, you also have the right to transfer your data, i.e. to request that we provide you with your personal data in a structured, commonly used format,
 - lodge a complaint with the President of the Office for Personal Data Protection (Stawki 2, 00-193 Warsaw), whenever you believe that the processing of personal data violates your rights.
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Who do we share your personal data with?

By downloading our App via Google Play or the App Store, you provide certain information to the providers of these platforms, in particular your account data, such as your name, device ID and email address. We have no influence on the collection of this data and have no access to it. For details, see the privacy policy of the Google Play app or App Store.

Your personal data may be transferred to entities authorized to obtain personal data on the basis of the law, as well as to entities to which we entrust data on the basis of agreements concerning the provision of services related to the functioning of our Application, among others hosting services, marketing services and delivery of IT systems. We may also transfer your personal data to providers of tools used to: conduct analytical research, create statistics, track App downloads, automate marketing.

Some of our service providers may store your data outside of the European Economic Area. In such situations, your data will be transferred only to countries that provide an adequate level of protection, and to countries that do not provide an adequate level of protection, only if appropriate safeguards are provided, including, among others, on the basis of standard contractual clauses adopted by the European Commission.