

Privacy Policy of elementy.xyz

Version of 19 October 2026 · applies to the service available at elementy.xyz
Elementy XYZ sp. z o.o. · ul. Kazimierza Pułaskiego 6/10, 26-600 Radom · KRS
0001265144 · NIP 7963050455 · REGON 545695402 · biuro@elementy.xyz · +48 692
140 468

1. Data controller

1. The controller of your personal data is Elementy XYZ sp. z o.o., ul. Kazimierza Pułaskiego 6/10, 26-600 Radom, Poland, entered in the Register of Entrepreneurs of the National Court Register under KRS number 0001265144 (District Court Lublin-Wschód in Lublin with its seat in Świdnik, 6th Commercial Division), NIP 7963050455, REGON 545695402.
2. For matters concerning personal data, write to biuro@elementy.xyz, call +48 692 140 468 or write to our registered office.

2. What data we process

1. Contact form and the “Ask about the house” assistant: first name and surname, e-mail address, telephone number, the content of your message or question, information about your plot (whether you have one, postal code) and the selected house configuration.
2. Reservation: first name and surname, e-mail address, telephone number, company name and tax ID (if booking as a business), the cadastral parcel identifier and the nearest address of the plot (delivery address), postal code, house configuration, whether you requested an early start of the plot analysis, and the reservation number.
3. Deposit payment: for online payment via PayU — amount, description, payment status and transaction number (we do not receive card, account or BLIK details); for a traditional bank transfer — the transfer details (sender, account number, title).
4. PDF offer sent by e-mail: e-mail address and house configuration.
5. Newsletter: e-mail address, site language, where you subscribed, selected interests, information about your plot and a link to your saved configuration, as well as the subscription date and the date, time and IP address of the confirmation.
6. Show-home visit sign-ups and expressions of interest in upcoming options (“coming soon”): e-mail address and selected interests.
7. Investor form: company name, contact person details and information about

the planned investment.

8. Technical data: IP address, browser and device type, time of visits and server requests (server logs) and — with your consent — analytical data on how you use the site.
9. The configurator runs in your browser. Your choices of modules and finishes reach us only when you send them yourself (contact form, reservation, PDF offer).

3. Purposes and legal bases

1. Answering an enquiry and preparing a quote — steps taken at your request before entering into a contract (Art. 6(1)(b) GDPR).
2. Concluding and performing the reservation agreement, including the preliminary plot analysis, handling the deposit and sending confirmations — performance of a contract (Art. 6(1)(b) GDPR).
3. Sending the PDF offer to the e-mail address you provide — steps taken before entering into a contract (Art. 6(1)(b) GDPR).
4. Newsletter and welcome e-mails after subscribing — your consent (Art. 6(1)(a) GDPR). Subscription must be confirmed via a link in an e-mail; without confirmation we do not send the newsletter.
5. Information about the show-home opening and the new options you asked about — your consent (Art. 6(1)(a) GDPR).
6. Settlements, accounting and tax obligations — legal obligation (Art. 6(1)(c) GDPR).
7. Establishing, pursuing and defending claims and demonstrating that consent was given — the controller's legitimate interest (Art. 6(1)(f) GDPR).
8. Security of the service, including protecting forms against spam and abuse and server logs — the controller's legitimate interest (Art. 6(1)(f) GDPR).
9. Visit statistics (Google Analytics 4) — your consent given in the cookie banner (Art. 6(1)(a) GDPR).
10. Open and click statistics for newsletter messages — the controller's legitimate interest in assessing the effectiveness of communication (Art. 6(1)(f) GDPR).
11. Providing data is voluntary, but without the data marked as required in the forms we cannot answer an enquiry or accept a reservation.

4. How long we keep data

1. Enquiries that did not result in a reservation or contract — for 12 months from the last contact.
2. Reservations and contracts — for the duration of their performance and then until the limitation period for claims expires and for the period required by tax and accounting regulations (as a rule 5 years from the end of the year in which the tax obligation arose).
3. Newsletter — until you unsubscribe (withdraw consent). After you unsubscribe we keep only the e-mail address on a suppression list, so that we do not send messages to it again, and information on the granting and withdrawal of consent — until the limitation period for any claims expires. Unconfirmed sign-ups are deleted.
4. Server logs and form-protection data — up to 12 months.
5. Google Analytics 4 analytical data — according to the data retention settings in Google Analytics, no longer than 14 months.

5. Who we share data with

1. We share data only with entities that help us run the service and handle your matters, under data processing agreements:
 - 1) SEOHOST sp. z o.o. (Poland) — hosting of the website and the server functions handling forms, reservations and payments;
 - 2) Brevo (Sendinblue SAS, Paris, France) — sending e-mails from the website (form submissions, PDF offers, reservation confirmations) and managing the newsletter list;
 - 3) Google Ireland Limited (Dublin, Ireland) — e-mail (Google Workspace) and, only with your consent, visit statistics (Google Analytics 4);
 - 4) Cloudflare, Inc. (USA) — protecting forms against bots (Cloudflare Turnstile) at the moment a form is sent; it processes, among other things, the IP address and browser data;
 - 5) providers of accounting, legal and IT services to us — to the extent necessary to perform them.
2. Payment operator. Online payments are handled by PayU S.A., Poznań (ul. Grunwaldzka 186, 60-166 Poznań, KRS 0000274399), which is a separate controller for the purpose of processing payments. We share with PayU your name, e-mail address, telephone number (if provided), IP address and the payment amount and description. PayU's rules are set out in the PayU privacy policy (poland.payu.com).
3. A traditional bank transfer is also processed by the bank that holds our account.

4. Plot verification. When you enter the parcel identifier during a reservation, your browser checks it in the public services of the Polish Head Office of Geodesy and Cartography (GUGiK) — the cadastral parcel location service and the address search service. Only the parcel identifier or coordinates are sent to GUGiK — without your contact details.
5. Some providers (Google, Cloudflare) may process data outside the European Economic Area, in particular in the USA. In that case the transfer is based on a European Commission adequacy decision (EU-US Data Privacy Framework) or on standard contractual clauses approved by the European Commission.
6. We do not sell personal data.

6. Your rights

1. You have the right to access your data and obtain a copy, to rectification, erasure and restriction of processing, to data portability and to object to processing based on legitimate interest.
2. You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal. You can unsubscribe from the newsletter with one click — the link is in every message — or by writing to biuro@elementy.xyz.
3. You have the right to lodge a complaint with the President of the Personal Data Protection Office in Poland (UODO, ul. Stawki 2, 00-193 Warsaw) or with the supervisory authority in your country of residence.
4. Please direct matters concerning data processed by PayU S.A. as a separate controller directly to PayU.
5. We do not make decisions based solely on automated processing that would produce legal effects concerning you. We only tailor newsletter content to the language and the interests you selected.

7. Cookies and browser storage

1. The site stores in your browser only the information necessary for it to work: the selected language and your cookie decision. Form protection (Cloudflare Turnstile) is activated only when a form is sent.
2. With your consent, given in the banner, we load Google Analytics 4, which stores cookies and collects anonymous visit statistics. Without consent, Google Analytics is not loaded.
3. You can change your decision at any time by clicking “Cookie settings” in

the site footer. You can also delete cookies and site data in your browser settings.

4. Newsletter messages may contain an element that counts opens and clicks (Brevo statistics) — see section 3(10).

8. Data security

1. We apply technical and organisational measures appropriate to the nature of the data, in particular an encrypted connection (HTTPS), storing access keys outside the website directory, protecting forms against bots and limiting access to data to authorised persons only.

9. Changes to this policy

1. We may update this policy, for example if the law or the way the service works changes. The current version is always available at this address, with the version date at the top of the page.