



# TOMLENS – Privacy and Cookie Policy

*Last updated: May 2025*

---

## Introduction

If you've landed here, it means you value your privacy – and we truly respect that.

This Privacy and Cookie Policy explains how we collect, use, disclose, and protect your personal data when you interact with our website [www.tomlens.com](https://www.tomlens.com) and related social media profiles. It also outlines your rights under the **EU General Data Protection Regulation (GDPR)**, **California Consumer Privacy Act (CCPA/CPRA)**, and **Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)**.

For any privacy-related concerns, contact:

 [tomasz.wegrzyn@tomlens.com](mailto:tomasz.wegrzyn@tomlens.com)

---

## Table of Contents

1. Who is the data controller?
  2. Contact for privacy matters
  3. Purposes of data processing
  4. What personal data we collect
  5. Anonymous Information
  6. How we obtain your data
  7. Data security
  8. Data retention
  9. Data recipients
  10. International data transfers
  11. Use of profiling and automated decisions
  12. Your rights under GDPR
  13. Your rights under U.S. law (CCPA/CPRA)
  14. Your rights under Canadian law (PIPEDA)
  15. Use of cookies and similar technologies
  16. Legal basis for using cookies
  17. Managing cookies
  18. Purpose of cookies and tracking tools
  19. External tools we use
  20. Behavioral tracking
  21. Targeted advertising
  22. How to manage your privacy
  23. Other important information
  24. Changes to this policy
-

## 1. Who is the data controller?

The data controller is **Tomasz Węgrzyn**, based at Alfreda Smoczyka 1/7, 68-200 Żary, Poland.

In the case of social media profiles (e.g., Facebook, Twitter), we act as **joint controllers** with the platform provider.

---

## 2. Contact for privacy matters

Contact us via email for privacy concerns:

 [tomasz.wegrzyn@tomlens.com](mailto:tomasz.wegrzyn@tomlens.com)

We do not appoint a Data Protection Officer, as this is not legally required in our case.

---

## 3. Purposes of data processing

We process personal data for:

- Fulfilling orders and contracts
  - Handling complaints and withdrawals
  - Responding to inquiries
  - Fulfilling tax and accounting obligations
  - Archiving
  - Defending or establishing legal claims
  - Operating social media accounts
  - Analytics and statistics
  - Internal marketing
  - Complying with data protection laws
- 

## 4. What personal data we collect

Depending on your interaction with us, we may collect:

- Name
  - Email address
  - Phone number
  - IP address
  - Billing details
  - Social media profile information
  - Information in communications
  - Technical data (browser, device, location, language)
  - Activity on our website (pages viewed, clicks, etc.)
- 

## 5. Anonymous Information

We also collect aggregated and anonymized data for statistical, analytical, and marketing purposes. This data cannot be used to identify any individual.

---

## 6. How we obtain your data

You provide your data when:

- Creating an account
- Placing an order
- Signing up for a newsletter
- Contacting us
- Interacting with our website or social media
- Accepting cookies

We may also collect data via external tools (see section 19).

---

## 7. Data security

We implement appropriate technical and organizational measures, including:

- Encryption
  - Access controls
  - Regular audits
  - Staff training
  - Secure hosting and infrastructure
- 

## 8. Data retention

We keep your data only as long as necessary for each purpose:

Purpose	Retention Period
Orders & contracts	Until contract is completed
Complaints	Until resolved
Legal claims	Until limitation period expires
Accounting	As per legal requirements
Analytics/Marketing	Until objection or no longer relevant
Communication	Until conversation ends

---

## 9. Data recipients

We share data with:

- Hosting providers
- Invoicing platforms
- CRM systems
- Accounting firms
- Technical service providers
- Legal advisors (if needed)
- Tax authorities
- Law enforcement (if required)

Anonymous data may be shared with analytics/ad platforms (e.g., Google, Meta).

---

## 10. International data transfers

We do not knowingly transfer your personal data outside the European Economic Area, USA, or Canada. Any external tools we use that involve transfers comply with standard contractual clauses or other legal mechanisms.

---

## 11. Use of profiling and automated decisions

We do **not** use profiling that leads to decisions with legal or significant effects.

We may use behavioral tools to suggest content or display personalized ads. These actions are **non-discriminatory and optional**.

---

## 12. Your rights under GDPR (EU residents)

You have the right to:

- Access your data
  - Rectify incorrect data
  - Erase your data
  - Restrict processing
  - Object to processing
  - Data portability
  - Withdraw consent
  - File a complaint to a supervisory authority
- 

### 13. Your rights under U.S. law (CCPA/CPRA – for California residents)

If you are a California resident, you have the right to:

- Know what categories of data we collect
- Request access to your personal data
- Request deletion of your data
- Opt-out of the sale/sharing of your personal information
- Not be discriminated against for exercising your rights

To exercise these rights, email: [tomasz.wegrzyn@tomlens.com](mailto:tomasz.wegrzyn@tomlens.com)

To opt out of selling/sharing: **[Add "Do Not Sell or Share" link here if applicable]**

We do **not** sell personal data for monetary gain.

---

### 14. Your rights under Canadian law (PIPEDA)

If you are in Canada, you have the right to:

- Know how and why your data is collected
- Access and correct your data
- Withdraw consent
- File a complaint with the Office of the Privacy Commissioner of Canada

We process your data only for clear, identified, and lawful purposes.

---

## 15. Use of cookies and similar technologies

We use cookies, tracking pixels, and APIs to:

- Enable website features
- Remember user preferences
- Analyze website traffic
- Deliver targeted ads

Learn more:

- [What are cookies?](#)
  - [Tracking pixels](#)
  - [Conversion APIs](#)
-



## 16. Legal basis for using cookies

We use cookies based on:

- **Your consent**, except for essential cookies
- **Legitimate interest**, where applicable

You may manage cookies upon your first visit.

---

## 17. Managing cookies

You can control cookies through:

- Browser settings
- Private/incognito mode
- Tools like [Ghostery](#)
- Privacy tools: [youronlinechoices.com](https://youronlinechoices.com)

Our site includes a built-in cookie management mechanism.

---

## 18. Purpose of cookies and tracking tools

Cookies support:

- Functionality (e.g., login, cart memory)
- Forms and interactive elements
- Media embedding (videos, audio)
- Analytics and marketing
- Social media integrations

Some cookies are from third-party services.

---

## 19. External tools we use

We use third-party tools, such as:

- Google Analytics
- Facebook Pixel
- Meta Ads Manager
- CRM/email automation platforms
- Hosting/CDN providers  
(Details available upon request or in an annex)

---

## 20. Behavioral tracking

Yes – we track website activity (clicks, time spent, page views) using external tools for analytics and improvement.

---

## 21. Targeted advertising

Yes – we run targeted ads based on:

- Age
  - Gender
  - Interests
  - Past interactions with our site
-

## 22. How to manage your privacy

You can manage your privacy by:

- Adjusting browser settings
  - Using privacy extensions
  - Browsing in incognito mode
  - Setting ad preferences at [youronlinechoices.com](https://youronlinechoices.com)
  - Using our website's cookie/privacy settings
  - Managing social media settings
- 

## 23. Other important information

We've made every effort to explain data privacy in clear terms. If anything remains unclear, don't hesitate to contact us.

 [tomasz.wegrzyn@tomlens.com](mailto:tomasz.wegrzyn@tomlens.com)

---

## 24. Changes to this policy

We may update this Privacy Policy due to legal, technical, or operational changes.

If you have an account or subscribe to our newsletter, we will inform you of material changes.