

PRIVACY POLICY

This privacy policy (hereinafter referred to as the "**Policy**") contains information regarding the processing of your personal data by the data controller as defined below, as well as the use of cookies.

I. General information

This Policy has been issued by the Personal Data Controller, which is zgoda.net sp. z o.o., 28 Efraim Schroeger Street, 01-822 Warsaw, NIP: 5272726570, REGON:360382008, KRS: 0000536149 and is addressed to all users (hereinafter: "**Users**") of our website (hereinafter: "**Website**"). Definitions applied in this Policy are explained in Point XII below.

Contact details of the Controller are provided in Point **XII** below.

This Policy may be amended and updated to reflect changes in the Controller's Personal Data Processing practices or changes in generally applicable law. We encourage you to read this Policy carefully and check this page regularly to verify any changes that the Controller may make in accordance with this Policy.

II. Processing of Users' Personal Data

Collection of Personal Data: The Controller may collect Users' Personal Data, such as: name, surname, and contact details, including e-mail address. The Controller may collect Users' Personal Data, in particular in the following cases:

- providing Personal Data by Users (e.g. contact by e-mail, telephone, form or any other means).
- collecting Users' Personal Data as a result of a business relationship/entering into or execution of an agreement (e.g. purchase of the Controller's service or product by a User).
- collection of Users' Personal Data published in social media (e.g., obtaining information from Users' social media profiles, to the extent that such information is visible to the public).
- obtaining Personal Data from third parties (e.g., contractors, financial intermediaries, law enforcement entities, including administrative bodies or courts, etc.).
- obtaining or asking Users to provide Personal Data of Users, during Users' visits to the Controller's websites or using any functions or resources available on or via the Website. When Users visit the Website, the User's devices and browsers may automatically provide certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connection to the Site and other technical information regarding communication), some of which may constitute Personal Data. During a visit to the Website, no Personal Data of Users will be stored by the Controller without the prior, express consent of the Users. However, the temporary storage of log files and cookies files facilitates the use of our Website. For this reason, Users are requested to give their consent to this on our Website. Granting of such consent is optional and does not affect your ability to use the Website. In some cases, without such consent, your ability to use our Website may be limited to a certain extent.

Processed Personal Data: The categories of Personal Data of Users processed by the Controller may, in particular, include:

- Personal Data: first name(s), last name(s), first name used, gender, date, photo.
- Contact data: delivery address, company (employer) address, telephone number, fax number, email address, social media profile details.
- Payment details: address for sending billing, bank account number, name of bank account holder, account security details.
- Communication content: all communications, queries, statements, views and opinions about us sent by Users or published on social media or through the Website.

Legal grounds for the Processing of Personal Data: When Processing Users' Personal Data for the purposes as set out in this Policy, the Controller may refer to one or more of the following legal grounds, as appropriate:

- Processing takes place on the basis of the User's prior voluntary, specific, informed and unambiguous consent to the Processing;
- Processing is necessary for execution of the agreement that the User has entered into or intends to enter into with the Controller;
- Processing is necessary to fulfil the legal obligation imposed on the Controller;
- Processing is necessary to protect the vital interests of any natural person;
- Processing is necessary to manage, conduct and promote the Controller's activities and does not prejudice the interests or fundamental rights and freedoms of the User.

Purposes of Data Processing: The purposes for which the Controller may process Users' Personal Data are as follows:

- Controller's Website: to operate and manage our Website, to present its content; to publish advertising and other promotional and marketing information; to communicate and interact with customers and suppliers, as well as potential employees or collaborators, through our Website.
- Offering the Controller's products and services to Users: to present our Website and other services; to provide promotional materials requested by Users; communication related to the Controller's services.
- Marketing communications: to present by any means (including e-mail, telephone, text message, social media, postal mail and personal contact) news and other information that may be of interest to Users, including the distribution of newsletters and other commercial information, having first obtained the Users' consent to send the information in an appropriate manner, based on generally applicable laws.
- Communication and IT operations: to manage communication systems, to operate for IT security purposes and IT security audits.
- Financial management: sales, finance, audit and sales management.
- Survey: engaging Users in order to obtain information on User opinions about the Controller's products and services.
- Improving our products and services: to identify problems with existing products and services; to plan improvements to the existing products and services; and to create new products and services.

III. Sharing Personal Data with third parties

The Controller may share Users' Personal Data:

- Administrative or judicial authorities, at their request, in order to inform about an actual or suspected violation of the applicable law;
- Persons carrying out audits, lawyers, PR agencies taking into account the obligation of confidentiality resulting from the agreement or imposed on these entities by law;
- Third parties processing the entrusted data on behalf of the Controller, regardless of their registered office, in accordance with the requirements of this point III below;
- Any entity competent for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal measures, including the safeguarding and prevention of threats to public security;
- To any receiving party, in the event of a sale or transfer of any organised part of the Controller or of any interest in the share capital of the Controller (including in the event of any reorganisation, dissolution or liquidation).

Notwithstanding the above, the Website may use plugins or content presented by third parties. If Users choose to use them, their Personal Data may be shared with third parties or social networking platforms. The Controller hereby recommends that you review the privacy policy of the third party before using its plugins or content.

We currently use redirects to the following social media on our pages:

<https://www.facebook.com/zgoda.net>;

<https://www.linkedin.com/company/zgoda-net/>;

<https://www.youtube.com/c/zgodanet>.

If we engage a third party to process Users' Personal Data in accordance with an entrustment agreement entered into with such entity, the Processor shall be obliged to: (i) Process only the Personal Data as instructed in advance by the Controller in writing; and (ii) take all measures to protect the confidentiality and security of the Personal Data and ensure compliance with all other requirements of generally applicable law.

Technical support services in connection with the use of the Website are provided by ESSYO sp. z o.o. This entity stores and processes Users' Personal Data obtained in the course of using the Website by Users. The Processor shall ensure full security of the Personal Data of Users by using appropriate and latest technical and organisational measures. The Processor may not use the Users' Personal Data provided to it for purposes other than those for which it was entrusted to it by the Controller. The Controller entered into a personal data processing entrustment agreement with the Processor on the basis of which the Processor is obliged to comply with the requirements concerning the protection of the Users' Personal Data.

IV. International transfer of Personal Data

At present, the Controller does not transfer and does not intend to transfer any Users' Personal Data to third countries which are not members of the European Union or to international organisations. If necessary, this Policy shall be amended and the transfer of your Personal Data may take place only in accordance with the standard contractual arrangements that Controller implements before the transfer of such Personal Data takes place. In such a case, Users shall be entitled to request a copy of the standard contractual provisions applied by the Controller, using the contact details indicated in Section XII below.

V. Data protection

The Controller shall inform that it has implemented appropriate technical and organisational protection measures to protect Personal Data, in particular including safeguards against accidental or unlawful destruction, loss, alteration, unauthorised publication, unauthorised access and other unlawful and unauthorised forms of Processing, in accordance with applicable law.

The Controller shall not be liable for the actions or omissions of the Users. Users are responsible for ensuring that all Personal Data is sent to the Controller in a secure manner.

VI. Accuracy of data

The Controller shall take all appropriate measures to ensure that:

- The Users' Personal Data that the Controller processes are accurate and, where necessary, made up to date; and
- All Users' Personal Data which are processed by the Controller and which are incorrect (having regard to the purpose for which they are being processed) shall be deleted or corrected without undue delay.

The Controller, at any time, may ask Users about the accuracy of the Processed Personal Data.

VII. Data scope minimization

The Controller takes all appropriate measures to ensure that the scope of the Users' Personal Data that it processes is limited to Personal Data that are adequately required for the purposes set out in this Policy.

VIII. Storage of Data

The criteria determining the duration of the period in which the Controller stores Users' Personal Data are as follows: the Controller keeps a copy of Users' Personal Data in a form that allows for its identification only as long as is necessary to achieve the purposes set out in this Policy, unless the provisions of generally applicable law require a longer retention period for Personal Data. In particular, the Controller may retain Users' Personal Data for the entire period necessary to establish, use or defend claims.

IX. Users' rights

In accordance with the provisions of the General Data Protection Regulation, with respect to the Users' Personal Data which are Processed by the Controller, the Users shall have the following rights:

- the right of access personal data;
- the right to correct personal data;
- the right to delete personal data;
- the right to limit the processing of personal data;
- the right to transfer personal data;
- the right to object to the processing of personal data;
- the right not to be subject to a decision involving automated processing.

If the Processing of Personal Data is carried out on the basis of the consent granted by the Users, the Users have the right to withdraw their consent at any time without affecting the lawfulness of the Processing carried out on the basis of their consent before its withdrawal.

In the case of incorrect Processing of Personal Data, Users shall have the right to lodge a complaint to the state supervisory body for data protection, i.e. to the President of the Office for Personal Data Protection.

The above does not affect the rights of the Users resulting from the acts or other provisions of generally applicable law.

In order to exercise one or more rights or inquire about those rights or any other provisions of this Policy or about the Processing of Users' Personal Data, please contact us using the contact details indicated in point XII below.

X. Cookie files (cookies)

The Controller uses the following Websites:

<https://zgoda.net/>

When you use the Website, the data about the User are collected automatically. This data includes: IP address, domain name, browser type, operating system type. The data can be collected through cookie files, Google Analytics and they may be saved in server logs.

Cookie files are small text files that are sent to your computer or other terminal equipment while the User is browsing the Website. Cookies remember User preferences, which makes it possible to improve the quality of services provided, to improve search results and the accuracy of information displayed and to personalise the website, to create website statistics.

The **controller of cookies** is zgodanet sp. z o.o. with its registered office in Warsaw.

The User **may opt out of** cookies (or apply the appropriate setting of preferences for their use by the web browser he/she uses) by selecting the relevant settings in the web browser he/she uses.

The User gives his/her consent to the storing or accessing of cookies by the Service Provider by reading the message about the use of cookies during the first visit to the Website, marking his/her consent to all cookies or marking selected cookies. The user can change the use of cookies at any time through the settings of the browser installed on the user's device.

The controller uses the types of cookies listed below:

1. Necessary cookies - This type of cookie is crucial to the functioning of the website. It allows users to navigate the website and use its features, such as setting privacy options or filling in forms. You can change your browser settings to block them, but the website will then not function properly.

2. Optional cookies - any cookies that may not be necessary for the operation of the website and are used for analytical and advertising purposes:

1. Analytical files - Analytical cookies collect statistical information that determines how the website is used. Our site allows third-party companies to use analytical cookies to study how users use the site and what content appeals to them. The data collected includes anonymous information such as the number of visitors to the site, the most popular pages. Enabling this cookie helps us to improve our website.
2. Advertising files - Advertising cookies are used by us and third parties to show you new adverts by recording those that have already been shown to you. They are also used to track clicks and conversions of displayed ads for billing purposes and to show you ads that are more relevant to you. For example, these cookies are used to detect when you click on ads and to show you ads based on your social media interests and browsing history.

The Controller uses the Google Analytics and Hotjar systems which are used for web analytics giving insight into Website traffic used for marketing purposes. The systems do not collect any personally identifiable data. Accordingly, the data collected through Google Analytics and Hotjar is not of a personal nature to us. The information we have access to is, in particular:

1. information about the operating system and the web browser you are using,
2. the sub-pages you view within our website,
3. the time spent on our site and on its sub-sites,
4. transitions between different sub-sites,
5. the source from which you navigate to our site.

Third-party social media (e.g. Facebook, Twitter, LinkedIn) may record information about you, for example when you click on the "Add" or "Like" button in relation to a particular social network while on the Website. The Service Provider does not control third party sites or their activities. Information on social media sites is available on the pages of these media.

Data provided by the User or collected automatically the Controller uses for:

1. proper functioning, configuration, security and reliability of the Website,
2. monitoring session status,
3. adapting the information displayed to the User's preferences,
4. analyses, statistics, surveys and audit of the Website views.

If you have any further questions on the use of cookie files, please send an e-mail to gdpr@zgoda.net. The rules specified in the Cookie Policy are subject to Polish law.

XI. Newsletter

Where Users give their voluntary, specific, informed and unambiguous consent to receive the Controller's newsletter, the Controller may send the Users an electronic newsletter with commercial information for promotional and informational purposes. Personal Data provided to the Controller in connection with subscribing to the newsletter will be used exclusively for the purposes of sending the newsletter. Users may unsubscribe from the newsletter at any time by using the unsubscribe option included in the newsletter, by using the opt-out link in the footer of the email or by otherwise contacting the Controller.

We will only store the Personal Data received from Users for the above purpose and for the period of time that Users subscribe to the newsletter and until Users withdraw their consent to subscribe to the newsletter.

The newsletter is distributed by GetResponse Sp. A. - This entity processes the Users' Personal Data on behalf of the Controller. The Processor also ensures the full security of the Users' Personal Data by using appropriate and latest technical and organisational measures. The Processor stores and processes the Users' Personal Data obtained during the registration process, i.e.: e-mail address and, if applicable, IP address and newsletter subscription data. The Processor may not use the Users' Personal Data provided to it for purposes other than those for which it received it. The Controller has entered into a personal data processing entrustment agreement with the Processor, on the basis of which the Processor has been obliged to comply with the requirements concerning the protection of the Users' Personal Data.

The transfer of Users' Personal Data related to the receipt of the newsletter is not required either for legal or contractual reasons, nor is it required for entering in any agreement. Therefore, providing the data or agreeing to receive the newsletter is not mandatory for Users. The legal grounds for receiving the newsletter are solely based on Users' consent (Article 6 (1) (a) of the General Data Protection Regulation). In the absence of such consent, the newsletter will not be sent.

XII. Contact details

If you have any questions, concerns or comments regarding the information contained in this Policy or any other issues relating to the Controller's Processing of Users' Personal Data, including for the purposes of exercising the rights referred to in Section IX of this Policy, please contact us at the following email address: gdpr@zgoda.net.

XIII. Definitions

- **Controller** means the entity that decides how and for what purposes Personal Data is processed. The controller shall be responsible for the compliance of the processing with applicable data protection law.
- **Personal Data** means any information about an identified or identifiable natural person. Examples of the Personal Data that the Controller may process are listed in section II above.
- **To process, Processing or Processed** means any activity relating to Personal Data whether or not performed by automatic means, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, making available by transmission, dissemination or otherwise making available, organising or combining, limiting, deleting or destroying.
- **Processor** means any person or entity that processes Personal Data on behalf of the Controller (other than an employee of the Controller).

