

**Privacy Policy** 

## §1 General Provisions

- 1. This document is an attachment to the Regulations. By using our services, you entrust us with your personal data. The purpose of the following privacy policy is to help understand what information and data is collected; what purposes it is collected for and how we process it. Your data is very important to us, so please read this document carefully as it defines the rules and methods of processing and protecting your personal data. This document defines also the 'cookies' policy.
- 2. We hereby declare that we follow the principles of the personal data protection and all legal regulations provided by the Act of 29 August 1997 on the Protection of Personal Data (Journal of Laws of 2015, item 2135) and the Regulation of the European Parliament and Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC.
- 3. The person whose personal data is processed has the right to obtain comprehensive information on how we use their personal data. We always strive to inform you about the data we collect, how we process it, what purposes we use it for and to whom we pass it, what protection we provide when we submit your data to other entities and provide information about the institutions to contact in case of doubt.

#### §2 Privacy regulations

- 1. We take your privacy seriously. We respect your privacy and aim to provide the fullest possible and guaranteed convenience of using our services.
- 2. We value the trust that our Users place in us by entrusting us with their personal data in order to fulfill the order. We always use personal data in a fair manner in order not to fail this trust, and only to the extent necessary to execute the order, including its processing.
- 3. The user has the right to obtain clear and complete information on how we use his personal data and what purposes they are needed for. We always clearly inform about the data we collect, how and to whom we pass it, and provide information about institutions to contact in case of doubts, questions or comments.
- 4. Your data administrator is DLLAB Sp. z o.o., ul. Orłowska 21, 88-100 Inowrocław, Tax Identification Number 5252423530; mail: info@dllab.eu
- 5. In case of any doubts regarding the use of your personal data, we will take all the necessary actions to immediately clarify such doubts. We answer all questions related to data protection in a full and comprehensive manner.
- 6. We will take all reasonable actions to protect Users' data against improper and uncontrolled use and to secure them in a complex way.
- 7. We will comply with all the applicable laws and regulations regarding data protection and we will cooperate with data protection authorities and authorized law enforcement authorities. In the absence of data protection regulations, we will act in accordance with generally accepted data protection principles, principles of social coexistence as well as established customs.
- 8. The exact protection policy of your personal data has been included in the personal data protection policy (PDPP: security policy, personal data protection regulations, IT system management instructions). For security reasons, due to the procedures described in it, it is available for inspection only to controlling authorities.
- 9. Should you have any questions regarding the manner of processing your personal data, please contact us through the contact form on our website. The contact request will be immediately forwarded to the appropriate person.
- 10. To help us respond to the information provided, please remember to provide your name and the necessary details.

§3 The purpose and scope of collecting personal data

- 1. We process the necessary personal data in order to provide services and for accounting purposes and only such as:
  - a) in order to present the offer,
  - b) in order to conclude the contract, consider the complaint or withdrawal from the contract,
  - c) in order to implement the provisions of the contract,
  - d) for optimization purposes,
  - e) for direct marketing of our services,
  - f) for issuing a VAT invoice or a receipt.
- 2. We collect, process and store the following user's data:
  - a) name and surname,
  - b) address of residence,
  - c) tax identification number (TIN),
  - d) e-mail address (e-mail),
  - e) telephone number,
  - f) information about the web browser used,
  - g) other voluntary personal data provided to us.
- 3. Providing these data is completely voluntary but also necessary to conclude and implement our services.
- 4. We may send personal data to servers located outside the country of residence of the user or to related entities, third parties based in other countries including those from the EEA (European Economic Area, EEA, European Economic Area, EEA free trade area and Common Market, including the countries of the European Union and the European Free Trade Association EFTA) for the purpose of processing personal data by such entities on our behalf in accordance with the provisions of this Privacy Policy and applicable laws, customs and regulations regarding data protection.
- 5. Bearing in mind the fact that in many countries to which personal data is sent, the same level of legal protection of personal data as in the user's country does not apply. For personal data stored in another country, legal access, can be obtained for example by: courts, law enforcement and national security authorities, in accordance with the regulations in force in that country. Subject to lawful requests for disclosure, we undertake to require entities that process personal data outside the user's country to take actions to protect data in an adequate manner in accordance with the regulations of their national law.

### §4 'Cookies' policy

- 1. We automatically collect the information contained in cookie files in order to collect your data. A cookie file is a small piece of text that is sent to the User's browser and which the browser sends back when you return to the same website. They are mainly used to maintain a session, e.g. by generating and sending a temporary identifier after logging in. We use 'session' cookies stored on the User's end device until logging out, turning off the website or turning off the web browser and 'permanent' cookies stored on the User's end device for the time specified in Cookie parameters or until they are deleted by the User.
- 2. Cookie files adjust and optimize the website and its offer for the user's needs through such activities as creating page view statistics and ensuring security. Cookies are also necessary to maintain the session after leaving the website.
- 3. The administrator processes the data contained in Cookies each time the site is visited for the following purposes:
  - a) optimization of the website;
  - b) identification of the Registered Users as currently logged in;
  - c) adaptation, graphics, selection options and any other content of the site to the individual preferences of the Customer;
  - d) remembering automatically or manually-added information, including data uploaded from order forms or login details provided by the visitor;
  - e) collecting and analyzing anonymous statistics showing how the website is used; in the administrative panel and google analytics;
  - f) creating remarketing lists based on preferences, behaviour, using of the Site and collecting demographic data, and then sharing these lists in AdWords and Facebook Ads
  - g) creating data segments based on demographic information, interests, preferences in the selection of products / services viewed;
  - h) using demographic data and data about interests in Analytics reports.
- 4. At any time, the user can completely block and delete the collection of cookies using his web browser.
- 5. Blocking the possibility to collect cookies on the user's device by the user may hinder or prevent certain functionalities of the site. The user is fully entitled to it however must be aware of functional limitations.
- 6. A user who does not want to use 'cookies' for the above-described purpose can delete them manually at any time. To read the detailed instructions for the procedure, please visit the website of the provider of the web browser used.

#### §5 Rights and duties

- 1. We have the right and we are also obliged in any case defined by law to provide selected or all information regarding personal data to public authorities or third parties who submit such a request for information on the basis of applicable provisions of the Polish law.
- 2. The User has the right to access the contents of the data he provides; the User may correct the data, supplement it at any time, and has the right to demand that it be removed from the database or stopped from being processed, without giving any reason. In order to exercise their rights, the User may at any time send a message to an e-mail address or in any other way that provides / transmits such a request.
- 3. We are committed to act in accordance with applicable laws and principles of social coexistence.
- 4. Information on extrajudicial handling of consumer disputes. The authorized entity, as stated in the Act on Out-of-court Consumer Dispute Resolution is the Financial Agent, whose website address is as follows: www.rf.gov.pl.

### §6 Basic safety regulations

- 1. Access data for Internet services that is: logins, passwords, PINs, electronic certificates, etc. should be secured in an inaccessible place and impossible to access from the Internet. They should not be disclosed or stored on the device in a form that allows unauthorized access and reading by unauthorized persons.
- 2. We strongly recommend that the user must be extremely cautious at all times when opening strange attachments or clicking links in e-mails that they do not expect, from unknown senders, or from the spam folder.
- 3. It is recommended to run anti-phishing filters in the web browser, i.e. tools which can confirm if the web page that is being displayed is authentic and is not being used for phishing by spoofing a person or an institution.
- 4. Files should be downloaded only from trusted websites. We do not recommend installing software from unverified sources, especially from publishers the user is unfamiliar with. It also applies to portable devices, e.g. smartphones and tablets.
- 5. When using your home Wi-Fi wireless network, a strong password, difficult to crack should be set. Patterns and strings of characters that are easy to guess (e.g. street names, host names, dates of birth, etc.) must be avoided above all. It is also recommended to use the highest possible standards for wireless Wi-Fi network encryption, which are possible to run on your equipment, e.g. WPA2.

§7 Using social media plug-ins.

- 1. Plug-ins, or the so-called social media plug-ins of Facebook.com and Twitter or other, may be used on our pages. The related services are provided by Facebook Inc., and Twitter Inc.
- Facebook is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA Facebook. To see Facebook plugins go to: <u>https://developers.facebook.com/docs/plugins</u>
- 3. Twitter is operated by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. To see Twitter plugins go to: <u>https://dev.twitter.com/web/tweet-button</u>
- 4. The plug-in provides its suppliers only with the information about when and what websites you have accessed. If you are logged into your account, for example on Facebook or Twitter, while viewing our website, the provider will be able to combine your interests, information preferences and other data, for example, by clicking the 'Like' button or leaving button comment, or entering the name of the profile in the search bar. This information will also be transferred directly to the supplier via the browser.
- 5. More detailed information on the collection and use of data by Facebook or Twitter and about their privacy protection can be found on the following pages:
  - a) Data protection / privacy tips issued by Facebook http://www.facebook.com/policy.php
  - b) Data protection / privacy advice issued by Twitter: <u>https://twitter.com/privacy</u>
- 6. In order to avoid having your visit on our website registered to a selected user account via Facebook or Twitter you must log out of your Facebook or Twitter account before browsing our websites.

# Copyright note to the Regulations

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