### 1. Preliminary provisions

This policy has been developed in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 (RODO) and concerns the processing and protection of personal data by Cybersolus Ltd.

### 2. Data Administration

Cybersolus sp. z o.o., as Administrator, is responsible for the protection and processing of personal data. We ensure that the data is processed in accordance with the purposes specified when it was collected, and we comply with the applicable legislation.

#### 3. Contact and Communication with the Administrator

E-mail: office@cybersolus.com

Address: Piotrkowska 257a/U2, 90-456 Łódź

Users can contact us for information about the processing of their personal data.

## 4. Aims and Legal Basis of Data Processing

We process personal data for the following purposes:

- Conducting Direct Marketing: Personal data is used for individual
  marketing communications with selected customers to obtain a direct
  response. This processing is based on Article 6(1)(f) RODO, i.e. the
  legitimate interest of the Controller. The data are stored for as long as
  this interest lasts and for the period of possible limitation of claims. If
  the data subject objects to the use of his or her data for direct
  marketing purposes, the Controller shall cease to process the data for
  this purpose.
- Sending Information on New Products and Services
   Electronically: We send information about new products and services
   electronically based on the data subject's consent (Article 6(1)(a)
   RODO). The data is stored until the consent is revoked, which can be
   withdrawn at any time using the opt-out link provided in the message.

**Sending the Newsletter**: Data is used to send the newsletter on the basis of the data subject's consent (Article 6(1)(a) RODO). The data is stored until the user withdraws consent, which can be done via an opt-out link.

**Expression of Opinions by Customers**: We process personal data to collect customer opinions based on customer consent (Article 6(1)(a) RODO). Data is stored until consent is withdrawn.

Actions taken at the request of the Data Subject prior to the conclusion of a contract: Personal data are processed for the purpose of performing actions requested by the data subject, e.g. the preparation of an offer prior to the conclusion of a contract. The legal basis is Article 6(1)(b) RODO ("performance of a contract").

Actions taken at the Request of the Data Subject following the Submission of Voluntary Information: We process personal data in order to carry out actions such as setting up an account or responding to an enquiry sent via a contact form. The legal basis is Article 6(1)(a) RODO. The data are stored for the period necessary for the performance, termination or expiry of the contract and for the period after which any claims will be barred.

## 5. Data recipients

In order to enable the performance of contracts and ensure the proper functioning of the websites, the Administrator cooperates with various external entities. Such entities include, for example, postal companies, courier companies and payment transaction processing companies.

The transfer of personal data to these external entities only takes place to the extent that it is necessary to achieve the stated purposes. These external entities may only use the personal data provided to perform the tasks assigned by the Administrator. Recipients of personal data provided by the Administrator include:

- Postal and courier service companies, e.g. courier brokers, for delivery and mail handling.
- Technical support companies and IT solution providers, such as software providers, email services and hosting. Personal data is only shared with these entities if this is necessary for a specific purpose.
- Companies that enable the collection and publication of customer feedback, to the extent needed to gather this feedback.

The legal basis for the processing of personal data in the context of internal administrative purposes within the group of companies is Article 6(1)(f) RODO, according to which the processing is necessary for the pursuit of the legitimate interests of the Controller.

### 6. Rights of Data Subjects

Every data subject has the right to:

- Access to your data.
- Correct the data if they are incorrect.
- Deletion of data ("right to be forgotten").
- Restrictions on data processing.
- To object to the processing of data.

Data transfer.

## 7. Use of Data for Advertising Purposes and Cookies

## **Sending of Newsletter and Marketing Materials**

We send newsletters and other marketing material only to those users who have given their consent by providing their e-mail address. Users may unsubscribe from the newsletter at any time by clicking on the unsubscribe link included in each message sent, or by contacting the Data Controller directly at the address indicated.

#### **Use of Cookies**

Our websites use cookies, which are text files stored on users' devices. They are used to analyse how the website is used and to identify the user's browser. The user has the option of blocking cookies by changing the settings of their browser, which may however limit the functionality of the website.

The administrator uses the data from the cookies to anonymously analyse visitors' activities, e.g. which pages are opened, in order to provide advertisements tailored to their interests, also on the websites of partners in the Google and Facebook advertising network. Cookies are also used to optimise website management.

## **Onsite Targeting**

The administrator uses cookies to analyse user activity on the website, such as visiting specific pages, in order to be able to present personalised advertising and offers.

#### Retargeting and Use of Third Party Cookies for Advertising Purposes

Our sites make use of retargeting by using third-party services that install cookies, including:

- Google Analytics, Universal Analytics, Google Remarketing from Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Detailed information about these services is available at: Google Privacy Policy.
- Facebook Pixel from Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). More information can be found at: <u>Facebook Privacy Policy</u>.

### 8. Internet Analytics and Analytical Tools

The administrator uses Google Analytics, a tool from Google, to analyse website traffic using cookies. These cookies collect data, including the user's IP address, which is then sent to Google and may be stored on servers in the USA. Google uses this information to analyse user activity on the website, to create reports for Google

Analytics users and to provide additional services. In some cases, according to the law or when necessary, Google may share this data with third parties.

By using our website, you consent to the processing of data by Google in the manner and for the purposes described above. Google Analytics also uses the extension "\_anonymizelp()", which truncates IP addresses, preventing direct identification of the user.

Users have the option to refuse cookies by changing the settings on their browser, although this may limit the full functionality of the website.

Consent to data collection by Google Analytics can be withdrawn at any time, for example by using the Google Analytics Opt-Out tool available at: Google Analytics Opt-Out.

To block the transmission of data generated by cookies to Google, including data on website usage and your IP address, you can install special blocking plug-ins in your browser, available here: Google Analytics Blocking Plugin.

## 9. Social Network Plug-ins

So-called social media plug-ins are implemented on our website.

When you visit our website containing such a plug-in, your browser automatically connects to the servers of social media providers such as Facebook, Google, Twitter or Instagram. The content of the plug-in is directly transmitted to your browser by the social media service and integrated into the website. As a result of this integration, the service provider is informed that our website has been displayed by your browser, regardless of whether you have an account on the respective social network or not.

This information, including your IP address, is sent directly from your browser to the service provider's server (some of which are located in the USA) and stored there. If you are logged in to any of the social networks, this service can directly link your visit to our website to your social profile. The use of the plug-in, for example clicking on the "Like" or "Share" button, will also be transmitted to the social network and stored there, and this information will be visible to those in your network of contacts.

For details on the purpose and scope of data collection, processing and use by social media service providers, as well as your rights and privacy options, please refer to the privacy policies of these service providers:

LinkedIn: <u>LinkedIn Privacy Policy</u>
 Facebook: Facebook Privacy Policy

Instagram: Instagram Privacy Policy

If you do not wish the data collected during your visit to our site to be attributed to your profile on a particular social network, you should log out of that site before visiting our site. You can also completely block the loading of plug-ins on the site by using special browser extensions, such as blocking scripts by "NoScript" (available at: NoScript).

# 10. Automated Decision-Making

We do not use automated decision-making, including profiling, in a manner that would have legal consequences for the data subject.

#### 11. External links

Our website may contain links to other websites that have their own privacy policies. We encourage you to read them when you go to those sites.