

PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Controller** – YouNeedIT Spółka z ograniczoną odpowiedzialnością Spółka komandytowa with its registered office in Warszawa (02-202), ul. Kwitnącego Sadu 8.
- 1.2. **Personal data** – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.3. **System logs** – files storing a chronological record of information about events and activity in the IT system used to provide services by the Controller. The information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes such information for technical and administrative purposes, for the purpose of providing security of the IT system and managing it, as well as for analytical and statistical purposes in line with Article 6(1)(f) of GDPR.
- 1.4. **Policy** – this document.
- 1.5. **Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 1.6. **Profiling** – means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 1.7. **Pseudonymisation** – means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- 1.8. **Processor** – means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 1.9. **Behavioral advertising** – advertising tailored to User preferences;
- 1.10. **Contextual advertising** – advertising not tailored to User preferences;
- 1.11. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
- 1.12. **Website** – website maintained by the Controller at: www.youneedit.co
- 1.13. **User** – any natural person visiting the Website or using one or several services or functionalities described in the Policy.
- 1.14. **Consent** – means consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

2. LEGAL BASIS AND PURPOSE OF DATA PROCESSING VIA THE WEBSITE

USING THE WEBSITE

- 2.1. The User's activity on the Website, including his/her personal data, is recorded in system logs.
- 2.2. The Administrator processes personal data (including the IP address, identifiers, information obtained via cookies or other technologies) of all unregistered Users (people using the Website who do not have a profile on the Website) on the basis of:
 - 2.2.1. Article 6(1)(b) of GDPR, in order to provide electronic services which involve sharing contents on the Website with Users;
 - 2.2.2. Article 6(1)(f) of GDPR, for statistical and analytical purposes, by analysing User activity and preferences with a view to improving service provision;
 - 2.2.3. Article 6(1)(f) of GDPR, in order for the Controller to exercise possible claims or defend itself against claims, with a view to protecting the Controller's rights;
 - 2.2.4. Article 6(1)(f) of GDPR, for marketing purposes, related *inter alia* to behavioral advertising, of the Controller and other entities. Detailed rules for the processing of personal data for marketing purposes are described in points 2.7-2.12 of the Policy.

REGISTRATION ON THE WEBSITE

- 2.3. Persons who register on the Website are requested to provide details necessary to create and administer their accounts. The User may provide additional data to make the administration of his/her account easier. By providing such additional data, the User agrees to their processing. Failure to provide data marked as mandatory will make setting up an account impossible. Providing the other data (not marked as mandatory) is voluntary. Such data can be deleted at any time.
- 2.4. The Controller processes personal data on the basis of:
 - 2.4.1. Article 6(1)(a) of GDPR, for the purpose of providing Website account maintenance and administration services in respect of the provision of mandatory personal data;
 - 2.4.2. Article 6(1)(a) of GDPR, for the purpose of providing Website account maintenance and administration services in respect of the voluntarily provided data;
 - 2.4.3. Article 6(1)(f) of GDPR, for statistical and analytical purposes, by analysing User activity and preferences with a view to improving service provision;
 - 2.4.4. Article 6(1)(f) of GDPR, in order for the Controller to exercise possible claims or defend itself against claims, with a view to protecting the Controller's rights;
 - 2.4.5. Article 6(1)(f) of GDPR, for marketing purposes, related *inter alia* to behavioral advertising, of the Controller and other entities. Detailed rules for the processing of personal data for marketing purposes are described in points 2.7-2.12 of the Policy.
 - 2.4.6. A User may also log in to his/her Website account via social networks, including Facebook, Twitter, Instagram, G+ and others. In such a case the Website will acquire from the User's social network account only the data necessary for the registration and maintenance of his/her account on the Website. The user can

extend the scope of data acquired from the social network by changing plug-in settings.

- 2.4.7. A User may give personal data of other persons on the Website only on condition that in doing so he/she respects the applicable laws and the personal rights of such persons.

CONTACT FORM

- 2.5. The User may contact the Controller using an electronic contact form. To be able to do this, the User is required to provide personal data needed to contact him/her and/or to reply to his/her query. The User can provide other personal data to make the contact or correspondence handling easier. Providing data marked as mandatory is necessary for the query to be accepted and/or handled. Providing other data is voluntary. Failure to provide mandatory data will result in the Controller being unable to accept and/or handle the query.
- 2.6. The Controller processes personal data on the basis of:
- 2.6.1. Article 6(1)(b) of GDPR, for the purpose of identifying the sender and handling his/her query sent via the contact form.
- 2.6.2. Article 6(1)(f) of GDPR, for statistical and analytical purposes, by analysing User activity and preferences with a view to improving service provision;

MARKETING ACTIVITIES

- 2.7. The Controller and its trusted partners process Users' personal data for marketing purposes, including behavioral advertising, contextual advertising, the newsletter service, etc. The Controller also conducts other marketing activities, for example, sends commercial information electronically and conducts telemarketing activities based on profiling.
- 2.8. The Controller processes personal data in connection with its targeting behavioral advertising to Users based on User profiling. The use of personal data collected by means of this technology for marketing purposes, in particular to promote third party services and goods, requires the User's consent. The consent can be withdrawn at any time.
- 2.9. The Controller processes personal data in connection with targeting contextual advertising at Users, pursuant to Article 6(1)(f) of GDPR.
- 2.10. The Controller has the right to communicate marketing contents to Users otherwise than described in points 2.8 and 2.9 of the Policy, including by e-mail, phone or by sending an SMS/MMS, only after the Controller has obtained the User's consent thereto. The user may withdraw his/her consent at any time.
- 2.11. The Controller provides a newsletter service. Persons wishing to receive the newsletter are obliged to give their consent and provide their e-mail address. Failure to provide the personal data in question will make it impossible for the Controller to provide the service. The Controller processes the above data on the basis of:
- 2.11.1. Article 6(1)(b) of GDPR, in order to provide the newsletter delivery service;
- 2.11.2. Article 6(1)(f) of GDPR, in order to send marketing content to the User in the newsletter; for statistical and analytical purposes by analysing Users' activity and their preferences to improve service provision; in order for the Controller to exercise possible claims or defend itself against claims, with a view to protecting the Controller's rights;
- 2.12. The User may, at any time, unsubscribe from or subscribe to different newsletter distribution lists, while unsubscribing from all newsletter distribution lists results in

removal of the User's data from the mailing database and, as a result, discontinuance of sending newsletter to the given User. Link to the newsletter distribution lists subscription management is available in the footer of every newsletter.

SOCIAL NETWORKS

2.13. Pursuant to Article 6(1)(f) of GDPR, in order to maintain the profiles of Users, keep them informed about actions taken by the Controller, promote its services, products and events, the Controller processes personal data of the Users who visit the Controller's profiles in the social networks, including: YouTube, Instagram, Twitter, Facebook, G+, etc.

COOKIES AND OTHER FILES

2.14. Cookies are text files installed on the device of the Website User. Their task is to collect information which can make using the Website easier, *inter alia* by remembering the visits of Users to the Website and tracking the actions they take while visiting it. There are two types of Cookies:

2.14.1. "Marketing Cookies" – Cookies used by the Controller and its trusted partners for marketing purposes, e.g. to target behavioral advertising at the User by storing information and/or accessing information already stored in the User's device. The Controller is required to obtain the User's consent to use Marketing Cookies and personal data collected through them. The user can withdraw the consent at any time.

2.14.2. "Website Cookies" – Cookies used by the Controller and/or other entities providing the Controller with statistical and analytical services, *inter alia* for the purpose of providing services electronically and improving their quality, by storing information and/or accessing information already stored in the User's device. Six types of Website Cookies are distinguished:

- a) User interface customisation cookies – permanent cookies used to personalise user interface;
- b) multimedia player session cookies – session cookies of multimedia players active for the duration of the session;
- c) User centric security cookies – Cookies which ensure User security by detecting authentication breaches;
- d) Authentication cookies – Cookies used to provide services requiring authentication for the duration of the session;
- e) User input cookies – Cookies storing data entered by the User;
- f) Google Analytics Cookies – Cookies used by Google to create Website operation statistics and reports and analyse Website use. Google does not use the data it collects to identify the User or attribute this information to enable User identification. For further information see: <https://www.google.com/intl/pl/policies/privacy/partners>.
- g) Cookies Analytics – Cookies other than Google Analytics Cookies by means of which Website traffic can be monitored.

DURATION OF PERSONAL DATA PROCESSING

2.15. As a rule, personal data are processed as long as the service is provided/until the User's consent is withdrawn/until the User submits an effective objection to the processing of his/her data – where the Controller's legitimate interest is the legal basis for processing.

However, the duration of the processing of personal data by the Controller always depends on the type of service provided and the purpose of the processing of the respective data. The Controller may extend the period of data processing, if it is necessary to establish and exercise legal claims and/or defend against such legal claims and/or when this is required by legal regulations. The Controller will erase or anonymise personal data after the end of the processing period.

USER RIGHTS

- 2.16. The User has the right to:
- a) access his/her personal data;
 - b) request rectification of his/her personal data;
 - c) has his/her personal data erased;
 - d) have the processing of his/her personal data restricted;
 - e) have his/her personal data transferred;
 - f) file an objection to the processing of personal data by the Controller;
 - g) lodge a complaint with the supervisory authority competent for the protection of personal data;
 - h) withdraw his/her consent to the processing of his/her personal data at any time, if the data in question is processed by the Controller on the basis of the User's consent. To exercise any of the above rights, the User can contact the Controller directly via email to the following e-mail address: [biuro @ youneedit.co](mailto:biuro@youneedit.co).
- 2.17. The specific rights stemming from GDPR are described here:
<https://giodo.gov.pl/pl/569/9276>

DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 2.18. In connection with the service provision, the Controller discloses Users' personal data to third parties, including its IT system support providers, marketing agencies (insofar as required for providing marketing services), and the Controller's related parties, including its subsidiaries, or parties affiliated with the Controller through personal or equity ties. The User's personal data may be shared by the Controller with other parties for their own purposes, including marketing purposes, only upon prior consent of the User.
- 2.19. The Controller has the right to disclose information to competent authorities or third parties which/who request the Controller to disclose information about a given User (i.e. the User's personal data) provided they invoke a relevant legal basis and subject to applicable laws.

EEA

- 2.20. The Controller transfers personal data outside the European Economic Area (hereinafter the "EEA") only when necessary. The Controller is required to ensure that such data is protected by using the standard contractual clauses issued by the European Commission; by cooperating with the parties which process personal data in countries for which the European Commission has issued an appropriate decision, and when data is transferred to the USA, by cooperating with members of the Privacy Shield program.
- 2.21. The Controller is required to notify the User about the intention to transfer personal data outside the EEA at the time of collecting the respective data.

SECURITY

2.22. The Controller checks the security of personal data processing on an ongoing basis by verifying that personal data has been made available only to authorised persons and only to the extent necessary for the Controller to provide the Services. Any operations carried out on personal data by the Controller are recorded and conducted exclusively by authorised third parties ensuring that personal data processing safeguards are in place (including employees, co-workers, subcontractors, business partners of the Controller).

MISCELLANEOUS

2.23. In matters related to personal data processing Users can contact the Controller by writing to the Controller to its mailing address, i.e.: ul. Kwitnącego Sadu 8, 02-202 Warszawa or via email to the following e-mail address: [biuro @ younedit.co](mailto:biuro@younedit.co).

2.24. The Controller reserves the right to review the Policy.

2.25. The current version of the Policy was adopted on **25 May 2018** and has been in effect since.