

# **Privacy Policy**

# §1. GENERAL PROVISIONS

- 1. This Privacy Policy comes into force on 11 June 2021 and can be amended. In the case of persons who use the Website <a href="https://survicate.com">https://survicate.com</a>, the Privacy Policy comes into force on the date indicated in clause 1, and there is no need to provide information on the changes introduced. In the case of the Users who have accepted the Rules and Regulations as well as the Privacy Policy, the provisions of the Rules and Regulations shall apply to the changes in the document's applicability and providing information on such changes. The Rules and Regulations are available at URL address: <a href="https://survicate.com/terms">https://survicate.com/terms</a>.
- 2. The Service Provider and the data controller of user data (clients), people subscribed to the newsletter and potential customers is Survicate S.A. with its registered office in Warsaw (postal code 02 786) at ul. Zamiany 8 LU2, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under KRS number: 0001021023, NIP number: 9512390641, fully paid-up share capital: PLN 300,000.00, contact e-mail address: hello@survicate.com (hereinafter referred to as "Us").

### §2. SECURITY

- 1. The principles we follow:
  - a) We respect the right to privacy.
  - b) We take care of data, including personal data, security. The detailed information on protection of personal data can be found in the Rules and Regulations.
  - c) Connection with our Website is encrypted.
  - d) We do not request you to log on to the Account when we send invoices or any e-mail correspondence.
  - e) We do not request you to provide data by e-mail. We always conduct verification after logging on to the Account. We would like to ask you for understanding if certain actions require confirmation and verification. In such a case we many ask you to log on to the Account.
- 2. Using the Internet, choose only safe devices and networks. Do you know that when you log in a public WiFi network, the network administrator can see your data? If you use the Website at work, follow the security recommendations in force at your organization.
- 3. If you receive an e-mail from us, it will be from one of the following e-mail addresses: <a href="https://hello@survicate.com">hello@survicate.com</a>
  <a href="mailto:payments@survicate.com">payments@survicate.com</a>
  <a href="mailto:gdpr@survicate.com">gdpr@survicate.com</a>

### §3.COOKIES

- 1. Cookies are sent to Internet browsers, then stored in the memory of devices, and read by the server at each connection with the Website
- 2. Cookies do not include any information which would enable third parties to gain access to your personal data or to get in touch with you by means of, e.g. e-mail or telephone. We would also like to point out that cookies do not allow the Service Provider or third parties access to your private device
- 3. By using the Website, you consent to the use of cookies. You can manage the consent by clicking here https://assets.survicate.com/cookie-list/.



## §4. PERSONAL DATA

In connection with the implementation of the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and in the free movement of such data and repealing Directive 95/46 / EC (general regulation about data protection - hereinafter referred as "GDPR") we inform you that:

- 1. The personal data processed by us is for the purpose of:
  - a) performance of the contract or taking action at the request of the data subject, before concluding the contract (legal basis: Article 6 paragraph 1 point b of the GDPR),
  - b) handling of inquiries (Article 6 (1) (f) of the GDPR),
  - c) handling complaints (Article 6 (1) (b) of the GDPR),
  - d) storing the documentation and fulfilling the legal obligations incumbent on the Administrator (Article 6 (1) (c) of the GDPR),
  - e) sending the newsletter this is done only on the basis of the consent given, if it has been expressed (Article 6 (1) (a) of the GDPR),
  - f) monitoring and improving the quality of services provided, including support (Article 6 (1) (f) of the GDPR).
- 2. Providing data is voluntary, but necessary to use the Services. In the case of a newsletter, consent is voluntary and expressed by clicking a Subscribe button.
- 3. If the person has consented to data processing (legal basis: Article 6 paragraph 1 point a of the GDPR), the data is processed until the consent is withdrawn, but after this period, we have right to be archived information on who and when and what he consented (for the purpose of determining, investigating or defending legal claims). In other cases, the data is processed for a period justified by the implementation of the goal (e.g. performance of the Agreement, answering questions, tax regulations, etc.) The processing period depends on the possibility of establishing, investigating or defending claims or when retention of data is required due to tax regulations.
- 4. You have the right to access personal data, rectify, delete or limit their processing, the right to objection, the right to transfer data, the right to lodge a complaint with a supervisory authority.
- 5. Transaction data, including personal data, are provided directly by the User to the External Payment Channel.

#### §5. DATA RECIPIENTS

- 1. We take advantage of services of the software development companies and ones which maintain ICT systems with which we have entered into relevant agreements. Such agreements cover the rules for data processing and confidentiality. These data are not made available, and none of those companies has the right to process the data in another way than the one set out in the agreement. Your data, if a company has access to them, may be processed only for the needs of the correct provision of the services.
- 2. The newsletter service is provided by Hubspot based in the USA. The data is transferred as confidential and <u>is not owned by Hubspot</u>. Data from the European Economic Area (EEA) are transferred on the basis of the data processing agreement. Detailed information about how Hubspot processes data: <a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>.

If you have any questions, please get in touch with us <a href="hello@survicate.com">hello@survicate.com</a>