PRIVACY POLICY

I. Personal data administrator

1) Optidata Sp. z o. o. with its registered office in Kraków (hereinafter also: "Optidata"), ul. Wielicka 50/5, 30-552 Kraków is the administrator of personal data.

2) Contact details:

a) by post to the following address: Optidata Sp. z o. o., ul. Wielicka 50/5, 30 – 552 Kraków;

b) by email: optidata@optidata.pl;

c) by phone: +48 12 299 60 00.

II. Data protection officer

1) We have appointed a data protection officer (IODO). Namely, Mr. Ryszard Grabski, with whom you can get in touch concerning all matters regarding the processing of personal data.

You can contact the IODO as follows:

a) by post to the following address: Optidata Sp. z o. o., ul. Wielicka 50/5, 30 – 552 Kraków;

b) by email: abi@optidata.pl;

c) by phone: +48 12 299 60 00;

III. Purposes of processing and legal basis for processing

1) As part of our website, we collect personal data to enable the use of our website and its correct display, optimisation and improvement. This in turn ensures security and user settings information which adapts the website to their needs while maintaining the session. For this purpose, we process the data based on how the service recipient uses the service provided electronically (operational data):

a) markings identifying the service recipient;

b) markings identifying the termination of the telecommunications network or the IT system used by the service recipient;

c) information about the beginning, end and scope of every use of the service provided electronically;

d) information about the service recipient's use of services provided electronically.

2) Data processing is based on our legitimate interest to enable the operation of our website and improve its functioning.

3) Based on your consent, we will process your personal data to present a tailored offer of our products and services, marketing purposes, and commercial information, including advertising materials promoting our products, information about events as well as to conduct satisfaction surveys and evaluate products and services provided by Optidata.

IV. Data storage period

4) Operational data is processed for the period specified by the user in the settings of the browser used.

5) Data processed based on the user's consent will be processed until the consent to processing is withdrawn.

V. Data recipients

6) The recipients of personal data may be our employees and associates, the IT company serving us, entities providing us with legal, accounting or HR services, and our software and internet service providers. It is therefore possible that the data will be transferred to a third country. In this case, we ensure that the transfer will take place to a country that, per the position of the European Commission, ensures an adequate level of protection or that the entity to which the data is transferred will provide appropriate safeguards, enforceable rights of data subjects and effective legal remedies, including in particular by agreeing with the entity to which the data is transferred containing standard data protection clauses.

VI. Rights related to the processing of personal data

7) The data subject has the right to request access to personal data concerning him or her, rectification, deletion or limitation of processing.

8) In the case of data processing based on our legitimate interest, including data from functional cookies, as well as in the case of data processing for direct marketing purposes, the data subject has the right to object to the processing.

9) In the case of data processing based on the consent of the data subject, such a person has the right to withdraw consent at any time without affecting the lawfulness of the processing. To withdraw consent to the processing of data for the purposes indicated in point 3, please send a request to the following email address: abi@optidata.pl. To withdraw consent to the processing of data from cookies for advertising, statistical and targeting purposes, the user may withdraw consent by clicking on the following link https://www.optidata.pl/polityka-plikow-cookies-eu / and selecting appropriate options.

10) In each case, the data subject also has the right to file a complaint with the supervisory authority.

VII. Voluntary provision of data

11) Providing data is voluntary, and by setting cookies in the web browser used, the scope of personal data provided can be limited.

VIII. Other

12) We will not intentionally process any data of persons under 16 years of age. Our website is addressed to people who are 16 years old and above.

13) Whenever we process personal data, we apply applicable legal provisions.

14) The rights of the data subject may be exercised by submitting a request under this Privacy Policy, and unless it provides otherwise, using the contact details provided in this Privacy Policy.

15) We do our best to ensure that the deadline for processing the request does not exceed 30 days from receipt of the request.

16) We use adequate security measures to ensure proper protection of personal data.

17) We apply the legal principles ensuring the exercise of the rights of the data subject, and we have made sure our employees and associates are familiar with them.

18) This Privacy Policy is updated according to the needs and applicable legal provisions.

19) To obtain up-to-date information about our personal data protection principles, please review this website regularly.

IX. Policy regarding cookies (so-called Cookies)

The <u>www.vbl24.com</u> website (hereinafter referred to as the "Website") uses cookies (so-called "cookies"), and small text files containing IT data. Cookies are saved by the Website via a web browser on the end device (computer, tablet, smartphone) of the Website user. The cookies used by the Website are safe for Website users. Viruses or other malicious software can't reach users' end devices through them. These files do not in any way identify the personal data of Website users, are not harmful to users' end devices, and do not cause configuration changes in end users' devices or the software installed on these devices. To ensure the convenience of using our websites, we use Local Storage (LS) technology, which is similar in principle to cookies, but has slightly different properties.

LS is a separate part of the browser's memory used to store data saved by websites. It can only be accessed by a website running on the same website from which the data was saved. Unlike cookies, they are not sent by the browser each time a server is referred to. Data in LS is stored long-term by the browser and is not deleted when the browser is closed nor does it have a specific validity period. In the further part of this privacy policy, the term "Cookies" will also mean LS.

Cookies on the Website are used for functional purposes, i.e. to enable the use of our website and its correct display, its optimisation and improvement, ensure security, remember user settings and adapt the website to its needs, as well as to maintain the session. Moreover, with the user's consent expressed by selecting the appropriate option in the cookie message appearing after visiting the Website, cookies may also be used for statistical, advertising or targeting purposes. In this case, the entities which provide Optidata with cookie management, advertising, marketing or statistical services, including companies from the Google group, may be subject to receiving personal data too, including data transfer to a third country. In this case, we ensure that the transfer will take place to a country that, in accordance with the European Commission's stance, ensures an adequate level of protection or that the entity to which the data is transferred will provide appropriate safeguards, enforceable rights of data subjects and effective legal remedies, including an agreement containing standard data protection clauses. You can find more about how Google uses data online <u>HERE</u>.

In this case, the user has the right to data transfer, i.e. the right to receive your personal data from Optidata in a structured, commonly used, machine-legible, IT format. You can send this data to another data controller or request that Optidata send the data to another controller. However, we will only do so if such a transfer is technically possible. If the user consents to the use of cookies for targeting purposes, automated decision-making, including profiling, may take place. It involves creating a user's profile based on the content displayed by the user on the Website and other Internet portals, and results in adapting the content displayed by the user to the profile thus created. The user may object to profiling at any time.

Most web browsers have the option to accept cookies selected by default. The user is responsible for making changes to the browser settings regarding cookies. These settings can be changed, in particular, to disable cookies or notify about their placement on the Website user's end device. Disabling cookies may negatively affect the convenience of using the Website.

To manage cookie settings, select the web browser used by the user and disable cookies in it in accordance with the browser settings. Comprehensive information on managing cookies is available in the software (web browser) settings.

Details for people using specific web browsers, including:

- Internet Explorer
- Mozilla Firefox
- <u>Chrome</u>
- <u>Opera</u>

Restricting or disabling the use of cookies or local storage may affect some of the functionalities available on the Website. If you would like to learn more about what cookies are, how they are used and what alternatives exist, please go to: <u>http://wszystkoociasteczkach.pl</u>