

## PRIVACY POLICY

### I. About us

In order to ensure transparency and fairness in the processing of personal data, below are the personal data protection rules in force at 180heartbeats spółka z ograniczoną odpowiedzialnością established in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of

April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC - hereinafter RODO. This Policy is addressed to all future, current and former contractors of 180heartbeats spółka z ograniczoną odpowiedzialnością, as well as all visitors to the website [www.180hb.com](http://www.180hb.com) who may or may not be contractors of 180heartbeats spółka z ograniczoną odpowiedzialnością. Accordingly, this Policy also applies to persons interested in the services of 180heartbeats spółka z ograniczoną odpowiedzialnością as well as persons whose data 180heartbeats spółka z ograniczoną odpowiedzialnością processes on the basis of concluded contracts, including principals and contractors.

Please be informed that the Administrator of your personal data is 180heartbeats spółka z ograniczoną odpowiedzialnością based in Warsaw, address: Warsaw 00- 031, ul. Szpitalna 8a lok. 5, registered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under the KRS number 0001125287, NIP: 7010079202, REGON: 141065680, hereinafter referred to as "Administrator".

For data protection issues, you can contact at address: [rodo@180hb.com](mailto:rodo@180hb.com).

Personal data shall be obtained and processed in the manner and on the terms specified by the in this Policy.

### II. General provisions

We attach particular importance to protecting the privacy of our customers, contractors, distributors, partners, subcontractors, employees and associates. One of its key aspects is the protection of the rights and freedoms of individuals in connection with the processing of their personal data.

We ensure that the processing of your data is carried out in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: "RODO") Act of May 10, 2018 on the protection of personal data, as well as specific provisions (contained in labor law or accounting law, among others).

**180heartbeats spółka z ograniczoną odpowiedzialnością** is an administrator of personal data within the meaning of Article 4(7) RODO, we also use the services of processors referred to in Article 4(8) RODO. 8 RODO - they process personal data on behalf of the controller (these are e.g. IT companies, software providers).

We implement appropriate technical and organizational measures to ensure a degree of security that corresponds to the possible risk of violation of the rights or freedoms of individuals with different probability of occurrence and severity of the threat. Our data protection measures are based on adopted policies and procedures and regular training to improve the knowledge and competence of our employees and associates.

### **III. What we use your personal information for**

As an employer, we process the data of employees and persons who cooperate with us on a basis other than employment. Contact data obtained from contractors (e.g., their employees) is used for the conclusion and efficient execution of contracts. We use our customers' data for the purpose of contract performance and the provision of our services. We also carry out marketing activities and, in the course of these activities, we strive to reach the widest possible audience to provide them up-to-date information about our services. We share your data with third parties with your consent or when we are required to do so by law.

### **IV. On what terms and on what basis we process your data**

We exercise diligence to protect the interests of data subjects and, in particular, ensure that the data:

- processed lawfully, fairly and in a manner transparent to the data subject,
- collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with those purposes,

- adequate, relevant and limited to what is necessary for the purposes for which they are processed,
- correct and updated as necessary. We take steps to ensure that personal data which is inaccurate in the light of the purposes of its processing is promptly deleted or rectified,
- kept in a form which permits identification of the data subject for no longer than is necessary for the purposes of the processing,
- processed in a manner that ensures adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss or destruction.

In some situations, processing is necessary to fulfill a legal obligation incumbent on us as an administrator. Such obligations arise, for example, from regulations law labor or accounting law.

Processing may also be necessary for purposes arising from our legitimate interests, an example of which is the pursuit of claims from our business activities.

#### **V. What rights you have**

- We take appropriate measures to provide you with all relevant information in a concise, transparent, understandable and easily accessible form and to conduct all communications with you regarding the processing of personal data in connection with the exercise of your right to:
  - information provided when obtaining personal data,
  - information provided upon request - about whether data is being processed, and other matters specified in Article 15 of the RODO, including the right to a copy of the data,
  - rectification of data,
  - being forgotten,
  - processing restrictions,
  - data portability,
  - objection,
  - not be subject to a decision based solely on automated processing (including profiling),
  - information about a data breach.

If your personal data is processed on the basis of consent, you have the right to withdraw it. Consent may be withdrawn at any time, which does not affect the lawfulness of the processing carried out before the withdrawal.

The security of your data is our top priority, however, if you feel that we are violating the provisions of the RODO by processing your personal data, you have the right to file a complaint with the President of the Office for Personal Data Protection.

#### **VI. How we will contact you**

We provide information in writing or by other means, including electronically where appropriate. If you request it, we may provide the information orally, as long as we confirm your identity by other means. If you communicate your request electronically, to the extent possible, the information will also be provided electronically, unless you indicate to us another preferred form of communication.

#### **VII. Within what timeframe we will fulfill your request**

We strive to provide information promptly - as a rule, within a month of receiving a request.

If necessary, this deadline may be extended for another two months due to the complexity of the request. However, in any case, within one month of receipt of the request, we will inform you of the action taken and (in applicable cases) of extension of the deadline, stating the reason for such delay.

#### **VIII. Subcontractors/processors**

We may transfer your personal data to companies or other trustworthy business partners who provide services on our behalf. Where we work with entities that process personal data on our behalf, we only use such processors that provide sufficient guarantees that appropriate technical and organizational measures are implemented to ensure that the processing meets the requirements of the RODO and protects the rights of data subjects. We check in detail the entities to whom we entrust the processing of your data. We enter into detailed contracts with them and perform periodic checks on the compliance of the processing operations with the content of such contracts and the law.

Your personal data may receive:

- a) entities and bodies authorized to process personal data on the Based on the law,
- b) Banks when settlements are required,

- c) entities providing software delivery,
- d) Subcontractors who provide us with services such as assemblers,
- e) courier companies,
- f) cloud service providers,
- g) Law firms providing consulting services to the Administrator.

#### **IX. How we take care of the processing of your data**

To meet the requirements of the law, we have developed detailed procedures including such issues as, among others:

- data protection in the design phase and default protection,
- data protection impact assessment,
- notification of violations,
- keeping a register of data processing activities,
- data retention,
- the realisation of data subjects' rights.

We regularly review and update our documentation to be able to demonstrate compliance with the requirements of the law in accordance with the principle of accountability formulated in the RODO, but also, out of concern for the interests of data subjects, we strive to incorporate the best market practices.

#### **X. Data retention**

We keep personal data in a form that allows identification of the data subject for no longer than is necessary for the purposes for which the data are processed. After such a period, we either anonymize the data (deprive it of characteristics that make it possible to identify the person) or delete it. In the retention procedure, we ensure that the storage period of personal data is limited to a strict minimum.

We determine the period of data processing primarily on the basis of legal regulations (e.g., retention time for employee records, accounting documents), as well as the legitimate interest of the controller (e.g., marketing activities). The retention policy covers both data processed in paper and electronic form.

The storage period of personal data, depends primarily on the purpose for which the data is collected, according to the following criteria:

- the period of execution of the cooperation agreement/contract - in

case of data processing for the purpose of concluding and executing a cooperation agreement,

- the period of time necessary to handle the complaint submitted - in the case of data processing for the purpose of handling the complaint process,
- until the dispute is resolved / the parties are settled, taking into account the relevant limitation periods for claims - in the case of data processing for the purpose of asserting claims and taking action of a recovery nature,
- until you raise an objection - in the case of data processing for the purpose of satisfaction surveys among the administrator's clients and direct marketing (sending commercial information).

#### **XI. Mandates**

We ensure that any person acting under our authority and having access to your personal data processes it only on our instructions, unless otherwise required by Union or Member State law.

#### **XII. Changes to Privacy Policy**

The Privacy Policy may be supplemented or updated in accordance with the Administrator's ongoing needs to provide current and accurate information. The Administrator will notify of any changes to the Privacy Policy by publishing a new version of this policy via [www.180hb.com](http://www.180hb.com).

#### **XIII. Automated data processing**

Your personal data will not be processed by automated means (including profiling) such that any decisions could be made as a result of such automated processing.

## COOKIE POLICY

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In order to ensure transparency and fairness in the processing of personal data, below are the personal data protection rules in force at 180heartbeats spółka z ograniczoną odpowiedzialnością established in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC - hereinafter RODO. The Cookie Policy applies to the website [www.180hb.com](http://www.180hb.com) (hereinafter referred to as the "Website"), owned by **180heartbeats spółka z ograniczoną odpowiedzialnością** with its registered office in Warsaw, address: Warsaw 00-031, ul. Szpitalna 8a lok. 5, registered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under the KRS number 0001125287, NIP: 7010079202, REGON: 141065680.

### I. Introduction

The [www.180hb.com](http://www.180hb.com) website uses cookies.

In this document we inform you about the use of cookies on the Website.

### II. Who is the controller of your personal data?

The administrator of the data is **180heartbeats spółka z ograniczoną odpowiedzialnością** in Warsaw, address: Warsaw 00-031, ul. Szpitalna 8a lok. 5, registered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under the KRS number 0001125287, NIP: 7010079202, REGON: 141065680, hereinafter referred to as **the "Administrator"**.

We ensure that all your rights under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data



Protection Regulation) (hereinafter: "RODO") are met. This cookie notice is part of the privacy notice.

### **III. What kind of your data do we process?**

We may process data about how you use the Website via your computer, phone, tablet or other device through which you access the Website. Some of this data, in combination with other data, may constitute personal data.

Through the internet technologies used, we may process, for example:

- a. the name of the website from which the cookies come, the length of time they are stored on the end device and their unique number;
- b. Device data (e.g., device type/model, unique device identifiers, MAC address, IP address, operating system, operating system version and device settings, language set, screen resolution, browser version and type);
- c. events (e.g., time of website use, last website visit, length of website visit, type of pages and subsites visited);
- d. location data (e.g. IP address, data about your location obtained through various positioning technologies);
- e. Other data: data on site usage (e.g., the source of the hits, the ad campaign you came to the site from, the links you clicked on, what ads you saw, and what cookie banner consents you gave)

### **IV. What are cookies?**

"Cookies" are computer data, in particular text files, stored on users' terminal devices (computers, phones, etc.) intended for the use of websites. These files allow to recognize the user's device and appropriately display the website tailored to his individual preferences. "Cookies" usually contain the name of the website from which they come, the time they are stored on the end device and a unique number. Cookies are contained in the HTTP protocol, which serves to communicate the web server with the browser. It consists of: a key specifying the name of the value, the value and the lifetime after which the browser should delete the cookie. Their functions are mostly standard for the settings provided by the browsers. Cookies are used to facilitate the use of the website and to adapt its content, including our offers, to preferences and to increase the usability and personalization of website content.





Cookies used on the Website are divided into the following categories:

- a. essential cookies;
- b. preferential or functional cookies;
- c. analytical cookies;
- d. targeting or advertising.

#### V. What cookies do we use?

**Necessary cookies** - cookies that are necessary for use of the **www.180hb.com** Service are used, among other things, to ensure the stability of its operation. These cookies are absolutely necessary for the **www.180hb.com** Service to provide the services you have requested and/or for the sole purpose of transmitting the services and/or the **www.180hb.com** Service. You can set your browser to block or inform you of such cookies, however in this case, the Service will not be fully operational. These cookies do not store any data that would allow identification. **Preference or functional cookies** - are necessary for remembering selected privacy preferences, filling out online forms provided by us, remembering website settings.

**Analytical cookies** - we only use cookies if you have given us permission to do so. These cookies help us improve and measure the performance of Service **www.180hb.com** by collecting and reporting information about how you use it.

**Targeting or advertising cookies**- cookies that track users' online activity in order to create user profiles for the purpose of sending advertisements or tracking a user on a website or across several websites for similar marketing purposes.

#### VI. The purposes for which we use cookies:

- a. Ensure security and anti-fraud (preventing unauthorized access);
- b. To customize the content of the Website to your preferences and end-user device;
- c. preventing robots from performing certain actions on the Website Internet;
- d. Facilitate logging into a user's account, including through social media, and allow users to move between subpages on websites without having to log in again on each subpage;
- e. creation of anonymous, aggregated statistics that help to understand how the user uses the Website, which allows to improve their



structure and content;

- f. To enable improvement of the Service, including performance testing;
- g. to identify which advertisements a user has viewed, and to display advertisements on the Service and external websites, including those most closely tailored to the user's activity.

#### **VII. How long do cookies remain processed on my device?**

The length of time cookies remain on your device will depend on whether they are "permanent" or "session" cookies:

- a. "**Permanent**" cookies will be stored by your web browser and will remain valid until set expiration date, unless deleted by the user before the expiration date.
- b. "**Session**" cookies expire at the end of the Internet session when the The web browser is closed.

#### **VIII. Automatic processing of data (including through profiling) in a way affecting your rights**

In connection with your access to the Website, data from your terminal device is processed in an automated manner in connection with its invocation or performance of activity on the , so that we, as Data Controller, can evaluate certain factors about you, for the purposes for which we use cookies.

#### **IX. Google Analytics**

We use Google Analytics analytics tools that collect information about your visits to the site, such as the pages you viewed, the time you spent on the site, and transitions between pages. Google LLC's Google Analytics cookies are used for this purpose. As part of Google Analytics, we collect demographic and interest data. As part of your cookie settings, you can decide whether or not you consent to the collection of such data about you.

