

PRIVACY POLICY OF SOLVEE STUDIO SP. Z O.O.

I. INTRODUCTION

This Privacy Policy contains information concerning the processing by the Company **Solvee Studio Sp. z o.o.**, Warsaw (01-806), Bogumiła Zuga 29, Poland, entry number 0000731113, of personal data of Users, i.e. persons using the website located at <https://solveestudio.com/> (*hereinafter: the Website*).

The processing of your personal data in accordance with EU regulations, including respect for the applicable legal order and the sense of privacy and security of the Service Users, plays a key role in our activities in all areas of our business, in particular IT consultation and analysis, creating project specification, mocks and graphic layouts, development of complex multi application systems both for web and mobile, and further support.

II. DATA OF THE CONTROLLER

The controller of your personal data within the meaning of 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 (*hereinafter: GDPR*) is the Company **Solvee Studio Sp. z o.o.**, Warsaw (01-806), Bogumiła Zuga 29, Poland, entry number 0000731113.

In matters concerning data protection, the Controller can also be contacted at the following e-mail address: contact@solvee.pl

III. PURPOSES AND LEGAL BASES OF DATA PROCESSING

Please be advised that we limit the collection and use of User information to the minimum required to provide our services to you, including the IT consulting and analysis, at an appropriate level.

The data are collected actively by way of the Users voluntarily submitting them or passively as data automatically stored by the Server.

Your personal data in the form of your name, surname, telephone number, the name of the organization you represent, your organization's address/residence, email address, bank account number, data identifying the computer hardware/software the User uses, IP address, location, may be processed by the Controller on the basis of:

- a. consent (*Article 6(1)(a) of the GDPR*), for marketing purposes, to inform Users about the Controller's regulatory activities, events, news,
- b. legitimate interest of the Controller, to manage the Service, to ensure the safety of Users, to carry out statistical analyses, including for archival [evidential] purposes to secure information in the event of a legal need to prove facts, as well as for the possible assertion, pursuit or defense against claims (*Art. 6(1)(f) of the GDPR*),
- c. to comply with legal obligations arising from generally applicable legislation and the performance of relevant contracts, e.g. regarding cooperation concerning the development of IT consulting and analysis (*Article 6(1)(b) and Article 6(1)(c) of the GDPR*).

IV. TRANSFER OF PERSONAL DATA

The data may be transferred to entities processing them on our behalf on the basis of contracts concluded with the Controller, but only for the purpose and to the extent necessary for the aforementioned purposes, including, among others, entities providing IT, accounting, legal, marketing or other services on our behalf to ensure the proper functioning of the Controller, with the proviso that such entities process the data only in accordance with the Controller's instructions.

V. TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

We mostly transfer your data to entities located within the European Economic Area or which ensure an appropriate security standard. However, some of the services we use may also require data to be transferred and processed outside the EEA. Any such transfer of personal data will comply with applicable legislation and will be based on appropriate legal safeguards [standard contractual clauses for the protection of personal data approved by the European Commission].

VI. AUTOMATIC DATA PROCESSING

Personal data may also be processed automatically, in particular for the purposes of adapting the content of the communication to the addressee's preferences, sending reminders and personalized offers based on your history of using our Service and the information you have sent to us. Processing your data in this way will not affect your rights or have any legal effect.

VII. RETENTION PERIOD OF PERSONAL DATA

Please be advised that we only process your personal data for the period necessary to fulfill the purpose for which they are stored or for as long as we are legally required to do so, in particular until the statute of limitations for possible claims or the expiry of our legal archiving obligations, including those concerning the retention of accounting documents.

Where personal data are processed on the basis of your consent, your data will be stored until you withdraw the consent. You may withdraw your consent at any time. We point out that revoking your consent to processing will not affect the lawfulness of the processing carried out prior to consent revocation.

VIII. YOUR RIGHTS

Right to access your data and to obtain a copy thereof.

You have the right to obtain information regarding the personal data we hold about you, including a copy of those data.

Right to rectification/correction of your data

You have the right to request the rectification of your personal data that is incorrect. At the same time, taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by providing an additional statement.

Right of data erasure

You have the right to request the erasure of your personal data held by us in the following cases:

- a. your personal data are no longer necessary for the purposes for which they were collected,
- b. you have withdrawn the consent on which the processing is based and there is no other legal basis for the processing,
- c. you have lodged an objection to the processing and there are no overriding legitimate grounds for the processing or the objection relates to the processing for direct marketing purposes,
- d. personal data were processed unlawfully,
- e. personal data must be deleted in order to comply with a legal obligation under Community or national law,
- f. personal data were collected in connection with the offering of information society services, as referred to in Article 8(1) of the GDPR.

Right to data portability

You have the right to receive, in a structured, commonly used machine-readable format, personal data concerning you that you have provided to us, where the processing of such data is based on consent or contract and is carried out by automated means.

If you request that these data be sent directly to another entity, this will be done if this is technically feasible.

Right to restrict data processing

You have the right to request that the processing of your personal data be restricted, in the following cases:

- a. you question the accuracy of your personal data, for a period allowing us to check the accuracy of the data,
- b. processing is unlawful and you object to the erasure of the personal data, requesting instead that the use of the data be restricted,
- c. we no longer need your personal data for the purposes of processing, but you need them to assert, pursue or defend your claims,
- d. you have lodged an objection to the processing under Article 21(1) of the GDPR - until it is determined whether the legitimate grounds on the part of the Controller override the grounds for the objection.

Right to object to the processing

If your personal data are processed on the basis of a legitimate interest of the controller, you have the right to object at any time to the processing, in accordance with Article 21(1) of the GDPR.

Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time. The withdrawal of your consent to processing will not affect the lawfulness of the processing carried out before the withdrawal.

In circumstances where you wish to exercise your rights, please email us at: contact@solvee.pl or by post to the Controller's address, i.e. Warsaw (01-806), Bogumiła Zuga 29, Poland.

We would like to point out that the security of your personal data is a priority for us, however, if you consider that we are violating common law by processing your personal data, you have the right to lodge a complaint with the President of the Personal Data Protection Office.

IX. INFORMATION ON THE VOLUNTARY NATURE OF PROVIDING PERSONAL DATA

Your provision of personal data is voluntary, but necessary for the use of the services placed on the Website.

X. USE OF COOKIES

When visiting our Website, small text files called cookies are stored on the User's mobile device, which transmit information about the User's activity to the website operator's server. Cookies are not used to process personal data and their content does not allow for the identification of the User.

The following types of cookies are used within the Services:

Own:

- a. Session cookies – these are temporary files that are stored on the User's computer/mobile device until they leave the Services. Blocking session cookies by the User will not affect the functioning of the Services but may partially impede the use of certain elements of the Services.
- b. Permanent - these are files that remain on the User's computer/mobile device until they are deleted by the User.

Third parties:

Statistical cookies – these are used to record information about the first/last visit to the Website, the duration of the visit, the sub-pages viewed, the sources from which the User arrived at the Website. This information does not

record specific personal data about the User but is used to compile statistics on the use of the Services. These are Google Inc files [details of these files can be found at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>]. Blocking statistical cookies by the User will not affect the functioning of the Services. The length of time cookies are stored is indicated at the link above.

The User has the right to decide the extent to which cookies can be accessed on his/her computer/mobile device by modifying the settings of his/her Internet browser. Detailed information on the possibility and methods of handling cookies is available in the settings of the software (web browser) used by the User.

XI. DATA SECURITY

We take special care to protect the interests of data subjects and, in particular, we ensure that the data we collect are processed lawfully; collected for specified, legitimate purposes and not subjected to further processing incompatible with those purposes; substantively correct and adequate in relation to the purposes for which they are processed; and kept in a form which permits the identification of data subjects for no longer than is necessary to achieve the purpose of the processing.

We ensure that any personal information collected through the Service is used for the Controller's services. This information is not made available to any third party, except with the prior express consent of the persons concerned, or where the obligation to provide these data arises from legal regulations.

The Controller shall apply technical and organizational measures to ensure the protection of the processed personal data appropriate to the risks and categories of data protected, and in particular to protect the data against their access to unauthorized persons, against their being taken by an unauthorized person, against their being processed in violation of the applicable regulations, and against their alteration, loss, damage or destruction.

Personal data transmitted from the Website to the server are secured by an encrypted SSL connection. The Controller protects your personal data by ensuring a high level of security and by applying internal procedures and recommendations to prevent data from being made available to unauthorized persons.

Links to other websites [e.g. PayU, Facebook, YouTube] may appear on the Website. Such websites operate independently of the Service and are not supervised by the Controller in any way. These websites may have their own privacy policies and regulations, which we recommend that you familiarize yourself with.

XII. FINAL PROVISIONS

Your use of the Website constitutes your acceptance of the provisions of this Privacy Policy and your commitment to comply with it.

The Controller reserves the right to unilaterally amend this Privacy Policy at any time. Amendments shall come into effect from the date of their publication within the Service.

In matters not regulated by this Privacy Policy, provisions of generally applicable law shall apply.