

Document name: Privacy policy
Document approval date: 24.05.2018.
Document effective date: 25.05.2018.

Privacy policy

*The Privacy Policy document is an expression of the care for the rights of persons cooperating with the company **APP Sp. z o.o.***

It is also intended to fulfil the information obligation arising from art. 13 of the European Parliament and Council (EU) Regulation no. 2016/679 dated 27th of 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 (General Data Protection Regulation) (EU Official Journal L 119 dated 4.05.2016) further called GDPR. The rules described below are in effect since the 25th of May 2018.

1 Data Administrator

The Administrator of your personal data is:

APP Sp. z o.o. a registered office at the address ul. Przemysłowa 10, 62-300 Września, entered into the entrepreneurs' reegister kept by the District Court in Poznań, XXI Commercial Division of the National Court Register under the KRS number 0000278348, Tax ID 7891681180, REGON 300578847, share capital 3.050.000 PLN.

2 Personal Data

Definition in accordance with art. 4 of GDPR:

'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, surname, 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.

In particular, we process the following data:

- a. name (names), surname, e-mail address, correspondence address, business name of the represented entity, telephone number, position,
- b. in the case of businesses, we additionally process the following: Tax ID, REGON, office address, bank account number,

3 Basis and purpose of processing

Processing of personal data requires a legal basis, GDPR provides for several types of legal bases for data processing, in the case of using **APP Sp. z o.o.** services, the following three may occur:

a. Requirement of processing for the purpose of concluding or performing an agreement in which a data subject is a party, or to undertake actions at the request of the data subject prior to concluding an agreement;

Unwillingness to provide personal data in such instance results in the inability to conclude and perform an agreement and perform actions aimed towards concluding an agreement.

b. Requirement of processing for purposes arising from the legitimate interests of the data administrator or a third party;

c. Voluntary consent to marketing activities.

You may express such consent in several ways: e.g. by sending an inquiry via the Internet service, subscribing to our newsletter, registering for and participating in events organized by **APP Sp. z o.o.**, and in cooperation with the company's partners, and in any other manner proposed by **APP Sp. z o.o.** Granting such consent is entirely voluntary, however lack of consent may prevent performance of certain actions, i.e. sending marketing correspondence or participation in events.

4 Data processing period

4.1 For data processed on the basis of:

Requirement of processing for the purpose of concluding or performing an agreement and **Requirement** of processing for purposes arising from the legitimate interests of the data administrator or a third party – for a period necessary to perform the agreement or the legitimate interests of the administrator or third party, additionally observing periods arising from legal regulations.

4.2 For data processed on the basis of:

Voluntary consent

For a period from the date of granting consent until its withdrawal.

5 Disclosure of data

In connection with data processing for purposes stipulated in pt. 4, your personal data may be disclosed to other recipients or categories of recipients of personal data. The recipients of your personal data may be:

a. Manufacturers, suppliers, courier companies

b. Economic information offices

c. Financial and credit institutions

d. Entities which process your personal data on behalf of the Administrator based on concluded data processing outsourcing agreements.

6 Rights related to the fact of data processing

6.1 Concerning data processed on the basis of:

Requirement of processing for the purpose of concluding or performing an agreement and **Requirement** of processing for purposes arising from the legitimate interests of the data

administrator or a third party, the User whose data is subject to processing has the following rights:

- a. Right to access their data (art. 15 of GDPR)
- b. Right to amend their data (art. 16 of GDPR)
- c. Right to delete their data (art. 17 of GDPR)
- d. Right to limit the scope of data processing (art. 18 of GDPR)
- e. Right to data transferability (art. 20 of GDPR)
- f. Right to raise an objection (art. 21 of GDPR)

The user may exercise their rights by sending a corresponding request at the address **odo@app.com.pl**. The request may also be submitted via regular mail – by sending a registered letter containing the request at the data administrator’s contact address.

6.2 Concerning data processed on the basis of:

Voluntary consent

The User whose data is subject to processing has the following rights:

- a. Right to access their data (art. 15 of GDPR)
- b. Right to amend their data (art. 16 of GDPR)
- c. Right to delete their data (art. 17 of GDPR)
- d. Right to limit the scope of data processing (art. 18 of GDPR)
- e. Right to data transferability (art. 20 of GDPR)
- f. Right to withdraw their consent (art. 7 of GDPR)

The user may exercise their rights by sending a corresponding request at the address **odo@app.com.pl**. The request may also be submitted via regular mail – by sending a registered letter containing the request at the data administrator’s contact address.

6.3 Responses by the Administrator

The Administrator has one month to respond to a person who submitted a request in the scope of the actions undertaken. (art. 12 of GDPR)

6.4 Complaints

The data subject has the right to submit a complaint regarding the Administrator’s actions to the Supervisory Authority.

7 Cookie Policy

7.1 The Service does not automatically collect any information, with the exception of information contained in cookie files.

7.2 Cookie files (so called “cookies”) constitute information technology data, in particular text files which are stored on the Service User’s device and intended to use the Service’s websites. Cookies usually contain the name of the website from which they originate, the storage time on the User’s device and a unique number.

7.3 The entity which places cookie files on the Service User’s device and gains access to them is the Service operator, **APP Sp. z o.o.**

7.4 Cookie files are used for the purpose of:

1. adjusting the content of the Service's websites to the User's preferences and optimizing the use of websites; in particular these files allow to recognize the Service User's device and properly display the website, adjusted to the User's individual needs;
2. creating statistics which help understand how Service Users use the websites, which makes it possible to improve their structure and content;
3. maintaining the Service User's session (after logging in), thanks to which the User does not need to re-enter the login and password on every sub-page of the Service.

7.5 The Service incorporates two primary types of cookie files:

- "session cookies" and
- "persistent cookies".

"session" cookies are temporary files which are stored on the User's device until logging out, leaving the website or disabling the software (Internet browser).

"Persistent cookies" are stored on the User's device for a time specified in the cookie file parameters or until deleted by the User.

7.6 The Service uses the following kinds of cookie files:

1. "essential" cookie files, which make it possible to use the services available as part of the Service, e.g. authenticating cookie files used for services which require authentication within the Service;
2. cookie files used to ensure security, e.g. used to detect violations in terms of authentication within the Service;
3. "efficiency" cookie files, which enable collection of information regarding the methods of using the Service's websites;
4. "functional" cookie files, which enable "storage" of settings chosen by the User and User interface personalization, e.g. in terms of the selected language or region which the User comes from, font sizes, website appearance, etc.

7.7 In many cases software used to browse Internet sites (Internet browsers) by default allow storage of cookie files on the User's device. Users of the Service may at any time decide to change the cookie file settings. Such settings may, in particular, be changed to block automatic support of cookie files in the Internet browser's settings or in each instance inform of their storage on the Service User's device. Detailed information regarding the possibility and methods of cookie file support is available in the software's (Internet browser's) settings.

7.8 The Service Operator informs that limiting the support of cookie files may affect certain functionalities available on the Service's websites.

7.9 Cookie files stored on the Service User's device may also be used by advertisers and partners cooperating with the Service Operator.

7.10 More information regarding cookie files is available at the address <http://wszystkoociasteczkach.pl/> or in the "Help" section of your Internet browser's menu.

8. Deleting and managing cookie files

Most browsers allow users to control cookie files in the preference settings. Users should become familiar with the privacy protection policies of such browsers in order to learn their rules of using cookie files. Restricting the settings regarding use of cookies may have an adverse effect on the functionality of the Service.

9 Changes to the privacy policy

The data Administrator reserves the right to implement changes and amendments to this privacy policy. The current wording of the privacy policy and information regarding its effective date is available at the address:

<https://app.com.pl/polityka-prywatnosci/>