

## **PRIVACY POLICY OF PROGET'S WEBSITES**

IF YOU WOULD LIKE TO KNOW HOW YOUR DATA IS PROCESSED, PLEASE READ THE FOLLOWING PRIVACY POLICY, WHICH DESCRIBES THE USE OF COOKIES AND OTHER SIMILAR TECHNOLOGIES, AS WELL AS THE PROCESSING OF PERSONAL DATA COLLECTED THROUGH THE USE OF OUR SERVICES.

BY USING PROGET'S WEBSITES, EACH USER ACCEPTS THIS PRIVACY POLICY.

PROGET RESPECTS AND COMPLIES WITH THE PRIVACY RIGHTS OF VISITORS TO ITS SITES (HEREINAFTER: THE SITE).

WE UNDERSTAND THAT WE ARE RESPONSIBLE FOR PROTECTING THE DATA ENTRUSTED TO US BY USERS. WE TAKE SECURITY ISSUES VERY SERIOUSLY. THEREFORE, WE STRIVE TO PROTECT OUR SITES FROM UNAUTHORIZED ACCESS BY THIRD PARTIES AND CONTROL OUR METHODS OF COLLECTING, STORING AND PROCESSING INFORMATION. WE USE, AMONG OTHERS. FIREWALL, SERVER SECURITY DEVICES, ENCRYPTION DEVICES AND PHYSICAL SECURITY MEASURES. WE PROVIDE ACCESS TO DATA ONLY TO THOSE EMPLOYEES AND ENTITIES THAT NEED TO HAVE ACCESS TO IT TO PROCESS IT EXCLUSIVELY FOR THE PURPOSES DESCRIBED IN THE PRIVACY POLICY.

FOLLOWING ART. 13 PAR. 1-2 OF THE REGULATION OF THE EUROPEAN PARLIAMENT AND THE COUNCIL (EU) 2016/679 OF APRIL 27, 2016. ON THE PROTECTION OF NATURAL PERSONS CONCERNING THE PROCESSING OF PERSONAL DATA AND ON THE FREE MOVEMENT OF SUCH DATA AND THE REPEAL OF DIRECTIVE 95/46/EC (GENERAL DATA PROTECTION REGULATION, HEREINAFTER REFERRED TO AS RODO) (OJEU L 119, P. 1), WE INFORM YOU THAT:

### **1. IDENTITY OF THE ADMINISTRATOR**

- 1.1. The Administrator of personal data is Proget limited liability company with its registered office in Bielsko-Biała, Poland at 43-300 Bielsko-Biała, ul. Warszawska 28.

### **2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER**

- 2.1. The Administrator has designated a Data Protection Officer, who can be contacted via e-mail at [iod@proget.pl](mailto:iod@proget.pl) or in writing at the address of the Administrator's registered office.
- 2.2. User contact the Data Protection Officer in all matters relating to personal data processing and applying the law on data transfer.

### **3. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE**

- 3.1. When the User uses the Website, the Administrator collects his data to:
  - a) the extent necessary to provide the services offered;
  - b) information about the User's activity on the Website, including device IP, location data, Internet ID and information collected via cookies and other similar technologies.

- 3.2. Administrator's servers automatically save data such as: page requests sent by the User, date and time of the request, device data (e.g. hardware model), browser type, browser language, type of operating system, IP address and cookies.
- 3.3. IP address – each computer connected to the Internet is assigned a unique number - an IP address. On its basis, it is possible, for example, to identify the country from which a given user connects to the network.
- 3.4. Cookie files (so-called: cookies) – small text files sent by the Website visited by the Internet User to the Internet User's device (computer, smartphone, etc.).
- 3.5. The data provided as part of the Community User registration form is processed in order to enable secure access to the Community (logging in, reminders, password changes) and for Proget specialists to contact the User in connection with the use of the Community and Proget, in accordance with the Community regulations. The data provided will be processed until the User's account is deleted from the Community.
- 3.6. The Administrator also collects data using a solution from a third-party provider – Google Analytics. This tool works based on cookies but does not provide personally identifiable information. Please read the details of the Google Analytics privacy policy.
- 3.7. The Site Administrator collects information and personal data voluntarily provided by the User using the trial and contact forms.
- 3.8. Based on the voluntarily provided personal data, the Administrator shall not make any automated decisions towards the User, including decisions resulting from profiling.
- 3.9. The Administrator shall conduct a risk analysis on an ongoing basis to ensure that the Administrator processes personal data securely, ensuring that only authorized persons have access to the data and only to the extent necessary due to the functions they perform.
- 3.10. The Administrator shall take all necessary measures to provide guarantees to its subcontractors and other cooperating entities as to the application of appropriate security measures whenever they process personal data on behalf of the Administrator.
- 3.11. Provision of data is voluntary but necessary to conclude a contract, present a commercial offer, gain access to the software, and use the functionality.
- 3.12. Please be advised that Proget's use of the Proget SMTP application and transmission of information from Google APIs to any other application comply with the Google API Services User Data Policy, including the requirements for restricted use.

#### 4. PURPOSES AND LEGAL NOTICES OF DATA PROCESSING ON THE WEBSITE

- 4.1. User data is processed in order to:
  - a) to test the Proget Software based on the User's consent (basis of Article 6(1)(a) and RODO);
  - b) provide access to the Site (basis of Article 6(1)(b) of the RODO);
  - c) to create an account on the Proget System and on additional websites of the Administrator (support portal, notification service, in which e-mail address, User's name, and surname are used for logging in);

- d) to conclude a partnership agreement based on the User's interest in the Administrator's offer (basis of Article 6(1)(b) RODO);
- e) to perform a contract to which the User is a party or to take action at the User's request before entering into such a contract (basis of Article 6(1)(b) RODO);
- f) to perform legal obligations (basis of Article 6(1)(c) RODO);
- g) analytics – selection of services to meet customer needs, optimization of products based on User comments and interest, optimization of service processes based on the course of sales and after-sales processes (including but not limited to complaints) legally executed by the Administrator for legitimate reasons (basis of Article 6(1)(f) RODO);
- h) evidential (archival purposes) being the realization of the Administrator's legitimate interest in providing information in case of a legal need to prove facts (basis of Article 6(1)(f) RODO);
- i) possible establishment, investigation, or defense against claims being the realization of the Administrator's legitimate interest (basis of Article 6 (1) letter f RODO);
- j) customer satisfaction surveys, which is the realization of the Administrator's legitimate interest in determining the quality of its services and the level of satisfaction of its customers with its products and services (basis of Article 6 (1) (f) RODO)
- k) to offer directly (direct marketing) products and services of companies cooperating with the Administrator (partners), e.g., in the form of discount coupons, including matching them to users' needs employing profiling, which is a legitimate realization of the Administrator's and its partner's interests (basis of Article 6(1)(f) RODO);
- l) to participate in the recruitment process and apply for job offers posted by Administrator.

## 5. DATA PROCESSING PERIOD

- 5.1. User personal data resulting from the conclusion of contracts with Administrator's will be processed for the period in which claims related to this contract may arise, for example: for X + 1 years from the end of the year in which the contract expired, of which X years is the longest possible limitation period claims, an additional year is provided for last-minute claims and delivery issues, and year-end counting is used to determine a single data deletion date for contracts ending in that year.
- 5.2. Data processed for the purposes of direct marketing of Administrator's products and services may be processed until User object to their processing for this purpose or until you find that they have become outdated.

## 6. USER PERMISSIONS

- 6.1. At any time, the User has the right to object to data processing. The Administrator shall cease processing the data unless the Administrator demonstrates that, concerning specific data, there are valid legitimate grounds that override the User's interests, rights, and freedoms or if the data are required for the establishment, investigation, or defense of claims.
- 6.2. At any time, the User has the right to object to processing their data for direct marketing purposes. If the User exercises this right – the Administrator will stop processing their data for this purpose.
- 6.3. By the RODO, in addition to the above, the User is also entitled to:
  - a) the right to access your data and receive a copy thereof;

- b) the right to rectify (correct) your data;
- c) the right to delete data, limit data processing;
- d) the right to object to data processing;
- e) the right to data portability;
- f) the right to lodge a complaint with the supervisory authority;
- g) the right to information on the requirement/voluntary provision of data.

## 7. DATA RECIPIENTS

- 7.1. The Administrator's subcontractors (processing entities) may also have access to user data, e.g., accounting, legal, IT companies, claims adjusters, marketing agencies, including developers of software for handling applications and the recruitment process, sales support, companies providing hosting services for us in cloud computing, providing Administrator with online marketing systems.
- 7.2. The Administrator's suppliers are mainly based in Poland. Some of them are based outside the EEA. In connection with transferring user data outside the EEA, the Administrator ensured that its suppliers guaranteed high personal data protection. These guarantees result, in particular, from the obligation to use standard contractual clauses adopted by the Commission (EU) or participation in the "Privacy Shield" program established by Commission Implementing Decision (EU) 2016/1250 of July 12, 2016, on the adequacy of protection provided by the Privacy Shield EU-US. We do not cooperate with entities that do not guarantee proper security of personal data, particularly entities from the EEA that do not meet the GDPR and Proget's privacy policy requirements.

## 8. COOKIES

- 8.1. Cookies collect data that by themselves doesn't allow for the identification of a person, only when its combined with other unique identifiers or other information they allow for the identification of that person and then may constitute personal data.
- 8.2. Administrator process data from cookies to:
  - a) make it easier for Users to use the Website – cookies recognize the User's device and properly display the Website, tailored to their individual needs;
  - b) create anonymous Website statistics – Administrator can better understand the expectations of our Users and develop the Website to make it even more friendly.
- 8.3. Usually browsers allow cookies to be stored on the user's computer or smartphone by default. However, Internet Users can independently manage cookies, including blocking these files.
- 8.4. If you do not want to receive cookies, you can change your browser settings. Please note that disabling cookies necessary for registration, security, maintaining user preferences, which hinder the use of Proget Websites, in extreme cases may prevent the use of the Website.

## 9. LINKS TO OTHER WEBSITES

- 9.1. Websites belonging to Proget contain links (referrals) to other websites. Proget is not responsible for the privacy rules applicable on these websites. We urge you to read their privacy policies after going to other websites. This privacy policy applies only to Websites belonging to Proget.