

## Data Privacy Policy

Personal data (usually referred to just as "data" below) will only be processed by us to the extent necessary and for the purpose of providing a functional and user-friendly website, including its contents, and the services offered there.

Per Art. 4 No. 1 of Regulation (EU) 2016/679, i.e. the General Data Protection Regulation (hereinafter referred to as the "GDPR"), "processing" refers to any operation or set of operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction performed on personal data, whether by automated means or not.

The following privacy policy is intended to inform you in particular about the type, scope, purpose, duration, and legal basis for the processing of such data either under our own control or in conjunction with others. We also inform you below about the third-party components we use to optimize our website and improve the user experience which may result in said third parties also processing data they collect and control.

Our privacy policy is structured as follows:

- I. Information about us as controllers of your data
- II. The rights of users and data subjects
- III. Information about the data processing

## I. Information about us as controllers of your data

The party responsible for this website (the "controller") for purposes of data protection law is:

- PDASERWIS SP. Z O.O., VAT ID: 7011064935, Bielska 33/11, 02-394 Warsaw, Poland
- PDAserwis Adam Kasprzyk, VAT ID 5222741857, Henry Ford I 8, 09-100 Plonsk, Poland
- PDASERWIS CENTRUM USŁUG SP. Z O.O., VAT ID 7011064929, Bielska 33/11, 02-394 Warsaw, Poland
- PDAserwis Ltd., VAT ID 401056357, 62 Portman Rd, Reading RG30 1EA, United Kingdom
- PDA South Europe SL, VAT ID B09900416, Calle Teruel, Num. 1, Planta AT, Puerta A, 28020 Madrid, Spain

All further referred to as "PDAserwis".

The controller's data protection officer is:

- **Personal Data Protection Office**, 2 Stawki St. 00-193 Warsaw, Poland

## II. The rights of users and data subjects

With regard to the data processing to be described in more detail below, users and data subjects have the right:

- to confirmation of whether data concerning them is being processed, information about the data being processed, further information about the nature of the data processing, and copies of the data (cf. also Art. 15 GDPR);
- to correct or complete incorrect or incomplete data (cf. also Art. 16 GDPR);
- to the immediate deletion of data concerning them (cf. also Art. 17 DSGVO), or, alternatively, if further processing is necessary as stipulated in Art. 17 Para. 3 GDPR, to restrict said processing per Art. 18 GDPR;
- to receive copies of the data concerning them and/or provided by them and to have the same transmitted to other providers/controllers (cf. also Art. 20 GDPR);
- to file complaints with the supervisory authority if they believe that data concerning them is being processed by the controller in breach of data protection provisions (see also Art. 77 GDPR).

In addition, the controller is obliged to inform all recipients to whom it discloses data of any such corrections, deletions, or restrictions placed on processing the same per Art. 16, 17 Para. 1, 18 GDPR.

However, this obligation does not apply if such notification is impossible or involves a disproportionate effort. Nevertheless, users have a right to information about these recipients.

Likewise, under Art. 21 GDPR, users and data subjects have the right to object to the controller's future processing of their data pursuant to Art. 6 Para. 1 lit. f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permissible.

### III. Information about the data processing

Your data processed when using our website will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations or unless otherwise stipulated below.

- **Server data**

For technical reasons, the following data sent by your internet browser to us or to our server provider will be collected, especially to ensure a secure and stable website: These server log files record the type and version of your browser, operating system, the website from which you came (referrer URL), the webpages on our site visited, the date and time of your visit, as well as the IP address from which you visited our site.

The data thus collected will be temporarily stored, but not in association with any other of your data.

The basis for this storage is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the improvement, stability, functionality, and security of our website.

The data will be deleted within no more than seven days, unless continued storage is required for evidentiary purposes. In which case, all or part of the data will be excluded from deletion until the investigation of the relevant incident is finally resolved.

- **Cookies**

- a) **Session cookies**

We use cookies on our website. Cookies are small text files or other storage technologies stored on your computer by your browser. These cookies process certain specific information about you, such as your browser, location data, or IP address.

This processing makes our website more user-friendly, efficient, and secure, allowing us, for example, to display our website in different languages or to offer a shopping cart function.

The legal basis for such processing is Art. 6 Para. 1 lit. b) GDPR, insofar as these cookies are used to collect data to initiate or process contractual relationships.

If the processing does not serve to initiate or process a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Art. 6 Para. 1 lit. f) GDPR.

When you close your browser, these session cookies are deleted.

#### b) Third-party cookies

If necessary, our website may also use cookies from companies with whom we cooperate for the purpose of advertising, analyzing, or improving the features of our website.

Please refer to the following information for details, in particular for the legal basis and purpose of such third-party collection and processing of data collected through cookies.

#### c) Disabling cookies

You can refuse the use of cookies by changing the settings on your browser. Likewise, you can use the browser to delete cookies that have already been stored. However, the steps and measures required vary, depending on the browser you use. If you have any questions, please use the help function or consult the documentation for your browser or contact its maker for support. Browser settings cannot prevent so-called flash cookies from being set. Instead, you will need to change the setting of your Flash player. The steps and measures required for this also depend on the Flash player you are using. If you have any questions, please use the help function or consult the documentation for your Flash player or contact its maker for support.

If you prevent or restrict the installation of cookies, not all of the functions on our site may be fully usable.

- **Order processing**

The data you submit when ordering goods and/or services from us will have to be processed in order to fulfil your order. Please note that orders cannot be processed without providing this data.

The legal basis for this processing is Art. 6 Para. 1 lit. b) GDPR.

After your order has been completed, your personal data will be deleted, but only after the retention periods required by tax and commercial law.

In order to process your order, we will share your data with the shipping company responsible for delivery to the extent required to deliver your order and/or with the payment service provider to the extent required to process your payment.

The legal basis for the transfer of this data is Art. 6 Para. 1 lit. b) GDPR.

- **Customer account/registration**

If you create a customer account with us via our website, we will use the data you entered during registration (e.g. your name, your address, or your email address) exclusively for services leading up to your potential placement of an order or entering some other contractual relationship with us, to fulfil such orders or contracts, and to provide customer care (e.g. to provide you with an overview of your previous orders or to be able to offer you a wishlist function). We also store your IP address and the date and time of your registration. This data will not be transferred to third parties.

During the registration process, your consent will be obtained for this processing of your data, with reference made to this privacy policy. The data collected by us will be used exclusively to provide your customer account.

If you give your consent to this processing, Art. 6 Para. 1 lit. a) GDPR is the legal basis for this processing.

If the opening of the customer account is also intended to lead to the initiation of a contractual relationship with us or to fulfil an existing contract with us, the legal basis for this processing is also Art. 6 Para. 1 lit. b) GDPR.

You may revoke your prior consent to the processing of your personal data at any time under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent.

The data previously collected will then be deleted as soon as processing is no longer necessary. However, we must observe any retention periods required under tax and commercial law.

- **Contact**

If you contact us via email or the contact form, the data you provide will be used for the purpose of processing your request. We must have this data in order to process and answer your inquiry; otherwise we will not be able to answer it in full or at all.

The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR.

Your data will be deleted once we have fully answered your inquiry and there is no further legal obligation to store your data, such as if an order or contract resulted therefrom.

- **User posts, comments, and ratings**

We offer you the opportunity to post questions, answers, opinions, and ratings on our website, hereinafter referred to jointly as "posts." If you make use of this opportunity, we will process and publish your post, the date and time you submitted it, and any pseudonym you may have used.

The legal basis for this is Art. 6 Para. 1 lit. a) GDPR. You may revoke your prior consent under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent.

In addition, we will also process your IP address and email address. The IP address is processed because we might have a legitimate interest in taking or supporting further action if your post infringes the rights of third parties and/or is otherwise unlawful.

In this case, the legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in any legal defense we may have to mount.

- **Youtube**

The embedded videos on all PDAserwis pages are provided by YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. When playing, a connection to the YouTube servers is established. YouTube is informed which pages you are visiting. If you are logged into your YouTube account, YouTube can assign your surfing behavior to you personally. You can prevent this by logging out of your YouTube account beforehand.

If a YouTube video is started, the provider uses cookies that collect information about user behavior.

Anyone who has deactivated the storage of cookies for the Google Ad program will not have to reckon with such cookies when watching YouTube videos. However, YouTube also stores non-personal usage information in other cookies. If you want to prevent this, you must block the storage of cookies in the browser.

Further information on data protection at "Youtube" can be found in the provider's data protection declaration at: <https://policies.google.com/privacy>

- **LinkedIn (Insight-Tag)**

If you consent, we activate a LinkedIn Cookie when you visit our website (LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland).

The tag reports to LinkedIn what actions you have taken on our site as well as data by which you may be identified.

With the data LinkedIn can see that you have visited our website, what you have clicked on and if you clicked on a link on LinkedIn that connects you to our website. This allows

LinkedIn to show you interest-based content. LinkedIn can link this data to your user account and use it for its own purposes. For information how LinkedIn processes your data please check <https://www.linkedin.com/legal/privacy-policy>.

LinkedIn will anonymize the data within 7 days. Within 90 days, the data will be deleted again. You can object to the data storage at any time. The data collection is based on Art 6 para. 1 lit. A GDPR.

We do not receive any data about you or other LinkedIn users, but only statistics that show us, aggregated for all users for a certain time period, how they used our offers and ads on other platforms of LinkedIn. This helps us to determine which of our ads were successful and which ones were not.

Warsaw, 18.12.2024