

PRIVACY POLICY

In our business conducted under the name of FLINT TECH spółka z ograniczoną odpowiedzialnością with its registered office in Gdańsk at: ul. Sobótki 10b/2, KRS: 0000710823, we make it a point that your personal data are duly taken care of. Being the controller of your personal data we set ourselves the goal of providing adequate information on any matters related to the processing of personal data, especially in the light of the personal data protection regulations, including the 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: the 'GDPR'). In this Privacy Policy we inform you of the purposes and legal grounds of our processing personal data, the ways they are collected and used, and your related rights. As the owner of the online service of <https://flint.tech/pl>, we are obliged to inform you of the ww. files the service employs; therefore, you will find the relevant information below.

1. Personal Data Controller.

The Controller of the Users' Personal Data provided in connection with the use of the FLINT TECH sp. z o.o. website, especially our communicating with you on the chat window, holding training, distributing newsletters, and your reaching for other services available on the website, is FLINT TECH spółka z ograniczoną odpowiedzialnością with its registered office in Gdańsk at: ul. Sobótki 10b/2, KRS: 0000710823, contact: e-mail: rodo@flint.tech, tel. 668631379.

2. Your personal data are processed for the following purposes:

- a) to enable contact: sending the Users, to the e-mail addresses or telephone numbers they provide, answers to the questions earlier asked on the chat, contacting the Users and responding to their previously sent messages and enquiries,
- b) to inform of the Company's activities: organisation of training, courses, the available services, the projects in progress, and the current events,
- c) to promote the Company's products, services, and brand: distributing marketing and promotional information on the products and services, events and news, including newsletter subscription,
- d) to deal with statistics (by analysing the data of the fan page user activity),
- e) to contact representatives of the clients and suppliers, to coordinate actions taken under the contracts in performance, and to hold negotiations and talks with prospective clients,
- f) to profile the data held with the view of attaining better alignment of the marketing information with the User preferences,
- g) to seek exercising and defending our rights, should any mutual claims arise.

3. The legal grounds of processing your personal data:

- a) Art. 6(1)(a) GDPR: based on your consent to the processing of your personal data when you provide your data voluntarily,
- b) Art. 6(1)(b) GDPR: whenever the processing is necessary for the performance of the contract between the User and the Company,

- c) Art. 6(1)(c) GDPR: data can be processed to comply with the legal obligations the Company is subject to,
- d) Art. 6(1)(d) GDPR: the processing is necessary to protect vital interests of the data subject or of another natural person,
- e) Art. 6(1)(f) GDPR: the processing is necessary for the purposes stemming from the Company's legitimate interests.

4. The personal data processing period.

The time over which we will process personal data depends on the legal basis of their processing:

- a) whenever the data are processed based on consent: the processing continues until the intended purpose has been attained or the consent withdrawn;
- b) whenever we process personal data to perform a contract or take any actions preceding contract performance: over the time it takes to perform the order and thereupon for the duration of the claims limitation period and the law-prescribed accounting documentation archiving period;
- c) whenever we process personal data based on our legitimate interest: over the civil law claims limitation period or until the moment further processing is objected to; the latter applies to situations where the law grants the right to raise an objection;
- d) whenever personal data are processed in compliance with the binding law: the time over which the data are processed for that purpose is defined in the respective regulations.

5. The ways of processing your personal data.

- a) **the data obtained from the chat window:** The chat downloads the following data: first name, last name, e-mail, telephone number, and - optionally: other data you might provide. The personal data are processed based on your consent given by keying in the data in the chat window and sending them to us, i.e. based on Art. 6(1)(a) GDPR. The consent is voluntary.
- b) **the website visitors' personal data:** in connection with our use of the website, we process the following data the browser sends to the server: the IP address, the session start date and hour, information on the time zone, information on the source site, access status/http access code, the address of the site from which the entry was made, the browser type, the operating system and its interface, the browser software language and revision. The processing of the data is necessary for the correct operation of the website and ensuring its stability and safety. The processing is carried out based on Art. 6(1)(f) GDPR.
- c) the personal data processed in connection with the newsletter: when you decide to subscribe for the newsletter, we obtain data on the newsletter subscription form, namely: your first name, last name, e-mail address, and telephone number. Providing the data is voluntary, though necessary to subscribe for the newsletter. The legal grounds of processing the personal data is Art. 6(1)(a) GDPR.
- d) the personal data processed under Facebook Ads: this website uses marketing, advertising, and analytical tools offered by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA. In order that you can be sent personalised advertisement, we have implemented the Facebook Pixel on our website; the snippet automatically accumulates information on the visits to our website and the visited pages. The information collected by the Facebook Pixel is anonymous. You can prevent the storing of

the cookie files by setting the browser software appropriately, or using the appropriate browser plug. The legal grounds of the processing of personal data is Art. 6(1)(f) GDPR.

- e) the personal data processed in Google Analytics: this website makes use of Google Analytics, i.e. the service of analysing website traffic, provided by Google Inc (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Google Analytics employs the cookie files stored on your computer, and these enable analysing the website traffic. The information generated by the cookie files on the use of a website are typically forwarded to the Google server in the USA and stored there. In the name of the website operator, Google uses the information to assess the website visiting rate, produce reports on activity on the site, and render other services connected with the use of the website and the Internet at the website operator. Google shall not combine the IP address sent by Google Analytics with any other data. We use the tool to analyse and steadily improve the use of the website. You can prevent storing the cookie files by setting the browser software appropriately, or using the appropriate browser plug. The legal grounds of the personal data processing is Art. 6(1)(f) GDPR.

6. The entities processing data on behalf of the Company:

- the entities which support us in managing IT tools, including those providing the hosting service,
- the entities providing the accounting services,
- the entities providing courier or postal services,
- the public authorities to whom the data are forwarded in compliance with the regulations of the law,
- the entities providing document archiving services,
- plus other entities performing Company ordered tasks connected with ensuring continuity of its business.

The above listed entities process personal data only to the extent this is necessary for the Company to pursue its business. At every step into the processing of personal data, the Company is always guided by the principles of limiting the purpose, minimising the scope of data, and complying with the limited data storage periods.

7. The rights of the data subject.

Under the GDPR, you have the right to:

- a) request access to your personal data: the data subject has the right to obtain the controller's confirmation whether it holds his/her personal data, and if so, he/she has the right to access them and obtain the following information: on the method, scope, and purposes of processing the data, and the categories of their recipients.
- b) request that your personal data be rectified: the data subject has the right to request that the controller rectifies his/her incorrect personal data without delay. Bearing in mind the purposes of the processing, the data subject has the right to request that incomplete personal data be complemented, also by placing an additional declaration.
- c) request that your personal data be erased: the data subject has the right to request that the controller erases his/her personal data immediately, and the controller is obliged to delete that personal data without any undue delay, if any of the following circumstances occurs:

- the personal data have ceased to be necessary for the purposes they have been collected or processed in any other way;
- the data subject has withdrawn his/her consent the processing was based on, and there are no other legal grounds for their processing;
- the data subject objects to the processing, and there are no overruling and law-stipulated grounds for the processing;
- the personal data were processed in contravention of the law;
- the personal data must be erased to comply with the obligation stipulated in the EU law or the law of the member state the controller is subject to;
- the personal data were collected in connection with the offering of the information society services.

- d) request that the processing of your personal data be limited: the data subject has the right to request that the data controller limits the data processing in any of the following cases:
- if the data subject questions the correctness of his/her personal data – for the period enabling the controller to verify the data for their correctness;
 - if the processing is against the law, and the data subject objects to the erasure of his/her personal data requesting instead that their use be limited;
 - if the data controller does not need the personal data for the processing, but they are needed by the data subject to establish, exercise, or defend against claims;
 - if the data subject has lodged an objection against the processing – until it is ruled whether the legally substantiated grounds on the controller’s side are precedent to the grounds of the objections raised by the data subject.
- e) object to the processing of your personal data: the data subject has the right to lodge an objection at any time for causes stemming from his/her specific situation, against the processing of his/her personal data based on Art. 6(1)(e) or 6(1)(f) GDPR, including data profiling based on the regulations. The data controller must not continue processing the personal data, unless it proves the existence of vital and legitimate grounds for their processing, overruling the interests, rights, and freedoms of the data subject, or grounds for establishing, exercising, or defending against claims. If the personal data are processed for direct marketing purposes, the data subject has the right to object to the processing of his/her personal data for marketing at any time; the objection can concern the scope within which the processing is connected with direct marketing.
- f) request that your personal data be transferred: the data subject has the right receive his/her personal data he/she has provided to the controller in a structured, commonly used, and machine-readable format, and transfer the personal data to another controller without any hindrance from the controller to which the personal data have been provided, if the processing is based on consent or contract, and is performed using automated means.
- g) not to be subject to decisions made solely based on automated processing, including the profiling,
- h) file a complaint with the President of the Personal Data Protection Office, should the regulations on the protection of personal data applicable to you personally be infringed upon. The User can notify the GDPR control authority, i.e. President of the Personal Data Protection Office in Poland, that the Company violates the GDPR regulations. Here are the contact data: Urząd Ochrony Danych

Osobowych, ul. Stawki 2, 00-193 Warszawa, www.uodo.gov.pl, e-mail: kancelaria@uodo.gov.pl, telephone: 606-950-000

- i) withdraw your consent at any time in the event your personal data are processed based on your consent to the processing of your personal data (Art. 6(1)(a) GDPR). The withdrawal will not affect the lawfulness of the processing based on the consent before its withdrawal.

The Company shall verify all requests, demands, or objections in accordance with the binding personal data protection law. In response to your request, the Company can verify your identity or request the provision of additional information.

The provision of personal data is voluntary, though your refusal to provide information on the personal data necessary for the signing of a contract shall, unfortunately, prevent its conclusion.

8. Automated decision making, profiling

The Company's website has an in-built mechanism of profiling construed as a form of automated processing of personal data consisting in the use of certain User data. The obtained data include e.g.: the duration of the session, the location, and the data provided by the Users in forms, as well as the chat windows on the website.

The profiling aims at:

- aligning our offer, products, and services with the User expectations and preferences,
- aligning the forwarded marketing and advertising materials with the User interests and needs.

The tools used in the profiling include Google Analytics and Hotjar.

The above-stated purposes of using the tool and the consequences thereof come as the Company's legitimate interests in its capacity of the Personal Data Controller (Art. 6(1)(f) GDPR). The interests construed as above consist in the Company's making decisions which reduce the incurred operating costs of service provision and promotion the Personal Data obtained with the tool enable.

We assure that the above-indicated scope of the information and data downloaded serve solely the attainment of the above-specified purposes, they are not disclosed to any other entities specialising in producing profiles. The User can object to the profiling at any time, though this makes it impossible to send him/her marketing and commercial information or his/her receipt of new job offers aligned with his/her profile and professional experience. Voicing an objection to the profiling results in ceasing any further profiling. It does not, however, prevent processing the Personal Data, if other legitimate grounds exist, e.g. the consent.

9. Cookies.

Cookies are small files recorded on your electronic device by the websites you visit. Cookie files contain various information, frequently necessary for the website to work properly. Cookies are encrypted so as to prevent any unauthorised access thereto.

This website makes use of cookies. The information obtained in this way serves remembering the User's decisions, accumulating information on the device the User employs and his/her visits for the purpose of ensuring security and for analysing the visits and adjusting the content as appropriate. The information is not combined with any other data of the service Users, nor does it serve their identification by the controller.

The User has the option of setting the blocking of certain cookie types in the browser by defining e.g. that only those cookies shall be allowed which are necessary for the site to be displayed correctly. By default, most browsers permit the use of all cookies, however the User can change the settings at any time, he/she can also delete the already installed cookies. Each browser enables such action through the options accessible from the settings or preferences. The User can also visit the site in the so-called incognito mode which blocks the downloading of the visit data. The controller does not use the so obtained information for marketing purposes.

The cookie files are used to:

- a) adjust the content of the website service pages to the User's preferences, and to optimise his/her use of the Internet pages; the files enable recognition of the User's device and display the website in a way responding to his/her individual needs,
- b) create statistics which help understand the way Users reach for the Internet pages and in this way enable improving the website structure and content,
- c) provide the Users with advertising texts aligned in a way closest to their interests.

The types of cookies used:

- a) the necessary cookies, i.e. those which enable availing yourself to the services offered in the service,
- b) the functional cookies which enable remembering the settings selected by the User and personalising the User interface,
- c) the analytical cookies which enable monitoring User activity in the service,
- d) the advertising cookies which make it possible to deliver Users the advertising content aligned closest to their interests.

10. Personal data transfer to third countries,

The Company abides by the rule of not transferring any User personal data to third countries (outside the European Union) or international organisations. Should the intention to do so arise in connection with transactions carried out with Clients located in a third country, the Company shall make sure that in the event the need arises to transfer the data to that country or an international organisation, the country or organisation is certified to have appropriate level of protection by the European Union (in compliance with the Data Protection Regulation). Otherwise, the Company shall only be allowed to transfer personal data to a third country or international organisation on condition of ensuring the employment of appropriate security measures and provided that the rights of the data subjects remain valid and enforceable, and effective legal protection measures referred to in the General Data Protection Regulation exist; moreover, the Client shall be provided with information on the possibility to obtain a copy of the data or availability of the data location.

11. SOCIAL MEDIA.

The Company makes use of the following social portals: Instagram, Facebook, LinkedIn, and Twitter. The Company, in the capacity of the data controller, shall process the following data on the said portals:

- the basic identification data (first name and surname, nick) to the extent you have published the data in your own profile on the social portal;
- the data you have published on the social portal;

As concerns the information we are in possession of, extracted from the comments you have published, it will be available on our service until the time it is erased by the author.

Please, be informed that in connection with running a fan page, the Company processes the data of those who:

- have subscribed to the fan page by clicking on the following icons: ‘Watch’ or ‘I like it’,
- have reacted to the posts published by the Company, or published their own comments under any of the posts placed on the fan page,
- have sent an enquiry with the Company in a private e-mail,
- visit the Company’s fan page.

Please be informed that provision of your data is voluntary, though necessary to subscribe to the fan page, comment on or react to the posts, or send a private message to us because of the Facebook portal working principles. When the fan page is displayed by a logged-in user, the social portal collects statistical data automatically.

The data processed based on the Company’s legitimate interest shall continue to be processed until you lodge an effective objection, or the purpose of the processing has ceased to exist.

The data processed to comply with the law-imposed obligations shall continue to be processed over the period stipulated in the regulations.

Service privacy policies:

- Twitter: available at <https://twitter.com/en/privacy>
- LinkedIn: available at <https://www.linkedin.com/legal/privacy-policy>
- Instagram: available at <https://help.instagram.com/519522125107875>
- Facebook: available at <https://www.facebook.com/policy.php?ref=pf>

Any services rendered by third parties are beyond the Controller’s control. Such entities can alter their terms of service, their privacy policies, the purpose of data processing, and the ways of using the cookie files at any time.

12. The security principles.

The Company has implemented appropriate security measures aimed at protecting personal data from their loss, improper use, unauthorised processing, or modification. The Company commits itself to protect all information disclosed by the Users in compliance with the security protection and confidentiality standards.

13. Amendments to the policy.

Since the technology is developing and progressing, and the law is changing, the principles laid down in this Privacy Policy may be amended. The User shall be notified thereof by placing the new text of this document on the following website: <https://flint.tech/pl> .