

## **PRIVACY POLICY**

Below we present information on the processing of personal data and the use of cookies in connection with the use of our website <https://flint.tech/>, hereinafter referred to as the "Website".

### **I. BASIC INFORMATION**

1. The administrator of data collected via the Website is Flint Tech Sp. z o.o. with headquarters in Gdańsk at ul. Sobótki 10A / 2, 80-247, hereinafter referred to as the "Administrator" or "We".
2. Contact with the Administrator is possible at the following e-mail address: [hello@flint.tech](mailto:hello@flint.tech) or by post to the registered office address.
3. Each entity using the Website is its "User".
4. Personal data of the User of the Website are processed by the Administrator in accordance with applicable law, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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) - hereinafter referred to as "GDPR".
5. We guarantee the confidentiality of all personal data provided to us. We apply appropriate technical and organizational safeguards, thanks to which we can ensure that the data is properly protected against unauthorized access.

### **II. PROCESSING OF PERSONAL DATA**

#### **1. Contact forms**

##### **a) Purpose and legal basis**

Personal data sent via Contact Forms will be processed in order to answer the question. The legal basis for the processing of personal data is the Controller's legitimate interest in responding to the User's message and communicating with him (legal basis: Article 6 (1) (f) of the GDPR).

If the User asks the Administrator to present a commercial offer, his personal data will be processed on the basis of art. 6 sec. 1 lit. b GDPR, i.e. activities aimed at concluding a contract.

##### **b) Processing time**

The User's personal data will be processed for the period necessary to handle the correspondence, extended accordingly by the period resulting from the correspondence with the concluded legal relationship, archiving obligations, pursuing possible claims or other obligations required by generally applicable law.

##### **c) User rights**

On the terms described in the GDPR, the User who has provided his data via the contact form has the right to:

- access to the content of your personal data and obtain a copy thereof,
- request rectification of your data,
- requests to delete or limit the processing of your data,
- object to the processing of your data on the basis of a legitimate interest,
- transferring your personal data,
- file a complaint to the President of the Personal Data Protection Office, if he / she deems that his personal data is being processed unlawfully.

In order to exercise your rights, please send a message to the following e-mail address: hello@flint.tech

#### **d) Information on the requirement to provide data and profiling**

Providing personal data is voluntary, but necessary in order to respond to the message sent by the User.

Personal data will not be transferred to a third country / international organization and will not be subject to automated decision making in this profiling.

#### **e) Recipients of data**

Users' personal data may be transferred to service providers supplying the Administrator with IT, technical and organizational solutions, enabling the Administrator to run the Website and the electronic services provided through it, in particular: a computer software provider to run the Website, an e-mail and hosting provider.

The administrator uses only the services of such entities that provide sufficient guarantees to implement appropriate technical and organizational measures so that the processing meets the requirements of the GDPR and protects the rights of the data subjects.

## **2. The form for subscribing to the Newsletter**

### **a) Purpose and legal basis**

The data provided to the Administrator when subscribing to the Newsletter is used to send the User a Newsletter with news, information, commercial and marketing materials, e.g. about news, training and events related to the activities of Flint Tech Sp. z o.o.

When subscribing to the Newsletter, the User agrees to receive marketing and commercial content to the e-mail address provided. The legal basis for the processing of the e-mail address is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR), consisting in presenting the marketing and commercial content of Flint Tech Sp. z o.o. in connection with the consent expressed.

### **b) Processing time**

The data will be processed for the duration of the Newsletter operation or until the User resigns from receiving the Newsletter. The User may unsubscribe from the Newsletter at any time by clicking on the appropriate link at the end of each newsletter message, which will delete the User's personal data from the Newsletter database.

### **c) User rights**

On the terms described in the GDPR, the User who provided his data using the subscription form for the Newsletter has the right to:

- access to the content of your personal data and obtain a copy thereof,
- request rectification of your data,
- requests to delete or limit the processing of your data,
- object to the processing of your data on the basis of a legitimate interest,
- file a complaint to the President of the Personal Data Protection Office, if he / she deems that his personal data is being processed unlawfully.

In order to exercise your rights, please send a message to the e-mail address: hello@flint.tech

#### **d) Information on the requirement to provide data and profiling**

Providing personal data is voluntary, but necessary in order to subscribe to the Newsletter.

Personal data will not be transferred to a third country / international organization and will not be subject to automated decision making in this profiling.

#### **e) Recipients of data**

Users' personal data may be transferred to service providers supplying the Administrator with IT, technical and organizational solutions, enabling the Administrator to run the Website and the electronic services provided through it, in particular: computer software provider for running the Website, e-mail and hosting provider, shipping tool provider Newsletter.

The administrator uses only the services of such entities that provide sufficient guarantees to implement appropriate technical and organizational measures so that the processing meets the requirements of the GDPR and protects the rights of the data subjects.

### **III. COOKIES AND OTHER TRACKING TECHNOLOGIES**

#### **1. What are cookie files?**

Cookies (so-called cookies) are IT data in the form of text files, sent by the server and saved on the User's side (e.g. on the hard drive of a computer, laptop or on a smartphone's memory card - depending on which device the User of the Website uses) .

The data is collected and stored only in an anonymous form or under a pseudonym and does not allow the identification of the User. Most of the cookies used by the Website are so-called session files that are deleted when the User's browser session is closed. Cookies do not harm the User's computer and do not contain viruses.

#### **2. The purposes of using cookies**

The administrator may process the data contained in cookies when visitors use the Website for the following purposes:

- adjusting the content of the Website to the individual preferences of the User (e.g. regarding colors, font size, Website layout) and optimizing the use of the Website;
- keeping anonymous statistics showing how the Website is used;
- remarketing, i.e. researching the behavior of the Website visitors by anonymous analysis of their activities (e.g. repeated visits to specific pages, keywords, etc.) in order to create their profile and provide them with advertisements tailored to their expected interests, also when they visit the other websites on the Google Inc. advertising network.

#### **3. Information on the possibility of disabling cookies**

The Administrator informs the User that it is possible to configure the web browser in such a way that it prevents the storage of cookies on the User's end device. In such a situation, however, the use of the Website by the User may be difficult.

The Administrator indicates that cookies may be deleted by the User after they have been saved by the Administrator, through the appropriate functions of the web browser, programs used for this purpose or using appropriate tools available under the operating system used by the User.

#### **4. Third party cookies**

The website uses functions provided by third parties, which involves the use of cookies from these third parties. The use of this type of cookies is described below:

##### **a) Google Analytics**

The administrator may use Google Analytics services provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA to analyze website traffic and optimize it based on a legitimate interest (Article 6 (1) (f) of the GDPR) which is conducting the marketing process.

Google Analytics uses cookies that are stored on the User's computer and which enable the analysis of how the User uses the website. The information generated by cookies on the use of the Website is usually transferred to a Google server in the USA and stored there. If the IP anonymization is activated on the Website, the User's IP address will be shortened by Google within EEA countries. Only in exceptional cases will the entire IP address of the User be transferred to a Google server in the USA and shortened there. As part of Google Analytics, the IP address provided by the User's browser is not combined by Google with other data. On behalf of the Administrator, Google uses this information to analyze the User's use of the website, to compile reports on the activity on the Website.

For detailed information on how Google Analytics processes data, please see the explanations prepared by Google LLC at the link: <https://support.google.com/analytics/answer/6004245>.

The User may block information about his activity on the Website from being shared with Google Analytics. To do this, install the browser add-on provided by Google LLC available at the link: <https://tools.google.com/dlpage/gaoptout>

## **b) Social tools**

The Website uses plugins from the following social networks: Facebook, LinkedIn, Instagram and Google. Plugins for social networks are interactive elements on the Website, enabling the sharing of content from the Website on social media and allowing direct redirection of the User visiting the Website to the company's social profiles. After the User clicks on a given plug-in, a direct connection is established with the server of the given social networking site and he may then collect information and use cookies.

If the User is logged in to his own account on a given social network, the portal may assign the User's visit to the Website to the User's account on the portal. Information on the purpose of data collection, the scope of collected data, their further processing and use by individual social networks, as well as the related rights of Users and possible settings to protect privacy are provided in the privacy policies of individual social networks.

- Facebook – <https://www.facebook.com/about/privacy/update> ,
- LinkedIn – <https://www.linkedin.com/legal/privacy-policy> ,
- Google – <https://policies.google.com/privacy?hl=pl> ,
- Instagram – <https://help.instagram.com/519522125107875>

## **5. Server logs**

Using the Website involves sending queries to the server on which the website is stored. Each query directed to the server is saved in the server logs. Logs include User's IP address, server date and time, information about the web browser and operating system used by the User. Logs are saved and stored on the server. The data stored in the server logs are not associated with specific people using the website and are not used by the Administrator to identify the User. The server logs are only auxiliary material used to administer the Website, and their content is not disclosed to anyone except those authorized to administer the server.