

PRIVACY POLICY

I. Details concerning the Personal Data Controller

We would like to inform you that the controller of your personal data is the company **24/7Communication sp. z o.o.** with its registered office at ul. Świętojerska 5/7, 00-236 Warsaw, entered into the National Court Register under the National Court Register (KRS) no. 0000037818, with Tax ID no. 1181575985, e-mail address: office@247.com.pl, phone no. +48 22 279 11 00, hereinafter referred to as "**the Company**").

The Company runs and manages the website under the address www.247.com.pl.

II. Data Protection Officer

The Data Protection Officer appointed by the Company is Ms. Anna Żmijewska, available under the e-mail address: a.zmijewska@prosynergo.pl

III. The purposes and the basis of personal data processing

THE DATA OF WEBSITE USERS

In order to **contact you** in relation to the case you have described, we process personal data such as:

- first name and surname,
- e-mail address or phone no.,
- position, function,
- place of employment,
- data about the case in relation to which you have contacted us.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows us to exercise our legitimate interest, which in this case is responding to your message sent to us using the contact data provided on the website.

We process the following personal data for **archiving and evidentiary** purposes:

- first name and surname,
- e-mail address or phone no.,
- position, function,
- place of employment,
- data about the case in relation to which you have contacted us;
- date and time of your visit on the website,
- type of operating system,
- approximate location,
- the type of web browser used to browse the website,
- time spent on the website,
- the subpages visited,
- other data collected by Google Analytics.

- for the purpose of safeguarding information that may be used to establish facts of legal significance. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the possession of personal data that will enable to prove certain facts related to your contact with the Company).

We process the following personal data for the purpose of **establishing, investigating or defending claims**:

- first name and surname,
- e-mail address or phone no.
- position, function,
- place of employment,
- data about the case in relation to which you have contacted us;
- date and time of your visit on the website,
- type of operating system,
- approximate location,
- the type of web browser used to browse the website,
- time spent on the website,
- the subpages visited,
- other data collected by Google Analytics.

— for the purpose of protecting the proprietary interest of the Company. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the protection of its proprietary interest).

In order to **comply with the obligations arising from the GDPR**, we may process the following types of your personal data:

- first name and surname,
- e-mail address or phone no.
- other data provided for this purpose.

The legal basis for such processing is Article 6(1)(c) of the GDPR in conjunction with the GDPR, as well as Article 6(1)(f) of the GDPR, which allows for the processing of personal data if, by doing so, the Personal Data Controller pursues its legitimate interests (in this case, the interest of the Company includes, for example, keeping records and registers, as well as having information on individuals who have exercised the rights provided for in the GDPR);

For **analytical purpose (creation of statistics)**, i.e. research and analysis of the activity on the website belonging to the Company that subsequently serve the Company to improve the website, we process such personal data as:

- IP address,
- date and time of your visit on the website,
- type of operating system,
- approximate location,

- the type of web browser used to browse the website,
- time spent on the website,
- the subpages visited,
- data collected in cookies,
- other data collected by Google Analytics.

The legal basis for such data processing is Article 6(1)(a) of the GDPR (consent), which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of the tools).

We may process your following personal data **in order to enable you to use the website (its smooth functioning) and to ensure security:**

- data from cookies, e.g. your IP address.

The legal basis for such processing is Article 6(1)(a) of the GDPR (consent), which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of cookies); If you withdraw your consent to the processing of this data, the website may not function properly.

We may process your following personal data in order to enable **the use of social media features, i.e. redirection to the Company profiles on Facebook, Instagram and LinkedIn (to each separately):**

- data from cookies of website owners.

The legal basis for such processing is Article 6(1)(a) of the GDPR (consent), which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of cookies);

In order to **show you videos on Vimeo and YouTube**, we may process your following personal data:

- data from cookie files of website owners.

The legal basis for such processing is Article 6(1)(a) of the GDPR (consent), which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of cookies);

THE DATA OF PERSON CONTACTING US ON THE COUNTERPARTY'S OR THE CUSTOMER'S BEHALF, E.G. DESIGNATED EMPLOYEES OR AUTHORISED REPRESENTATIVES OF THE COMPANY OR PERSONS THAT ESTABLISH CONTACT IN ANOTHER MANNER THAN USING THE DETAILS PROVIDED ON THE WEBSITE

In order to **contact you** to enter into or perform a contract with a customer or a counterparty on whose behalf you contact us, or contact you in relation to a matter described by you - if you do not contact us on behalf of our customer or counterparty, the Company processes the following personal data:

- first name and surname,
- e-mail address or phone no.
- position or function,
- identification data of the customer or the counterparty (i.e. also your place of work, for

example) - if you contact us on behalf of our customer or counterparty,

- data about the case in relation to which you have contacted us.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows us to pursue our legitimate interest in communicating with you to conclude or perform a contract - if you contact us on behalf of our customer or counterparty, or answer your message- if you contact us in any other matter.

We have obtained your data directly from you or from the person in whose name and on whose behalf you contact us.

We process the following personal data for **archiving and evidentiary** purposes:

- first name and surname,
- e-mail address or phone no.
- position or function,
- identification data of the customer or the counterparty (i.e. also your place of work, for example) - if you contact us on behalf of our customer or counterparty,
- data about the case in relation to which you have contacted us.

- for the purpose of safeguarding information that may be used to establish facts of legal significance. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the possession of personal data that will enable to prove certain facts related to your contact with the Company, e.g. the compliance with this information obligation);

We process the following personal data for the purpose of **establishment, exercise or defence against claims**:

- first name and surname,
- e-mail address or phone no.
- position or function,
- identification data of the customer or the counterparty (i.e. also your place of work, for example) - if you contact us on behalf of our customer or counterparty,
- data about the case in relation to which you have contacted us.

— for the purpose of defence of the proprietary interest of the Company. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the protection of its proprietary interest).

We process the following types of personal data for the purpose of **keeping accounting books and tax records**, if your data were specified in the agreement as contact data or included in accounting documents:

- first name and surname,
- e-mail address,

- position or function,
- identification data of the customer or the counterparty (i.e. also your place of work, for example) - if you contact us on behalf of our customer or counterparty,
- data resulting from relevant tax regulations.

The legal basis for such processing is Article 6(1)(c) of the GDPR in conjunction with the relevant provisions of the tax law.

In order to **comply with the obligations arising from the GDPR**, we may process the following types of your personal data:

- first name and surname,
- e-mail address or phone no.
- other data provided for this purpose.

The legal basis for such processing is Article 6(1)(c) of the GDPR in conjunction with the GDPR, as well as Article 6(1)(f) of the GDPR, which allows for the processing of personal data if, by doing so, the Personal Data Controller pursues its legitimate interests (in this case, the interest of the Company includes, for example, keeping records and registers, as well as having information on individuals who have exercised the rights provided for in the GDPR);

PROFESSIONAL DATA OF CONTACT PERSONS
OBTAINED FROM VISITING CARDS OR AS GENERALLY AVAILABLE DATA

In order to **contact you**, the Company processes such personal data as:

- first name and surname,
- e-mail address or phone no.
- position or function;
- your workplace data,
- data from correspondence exchanged between us.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows us to exercise our legitimate interest - in this case consisting in the maintenance and development of business relations with you or the entity you represent.

We have obtained your data directly from you, e.g. from your business card, or from generally available sources, such as your company website or www.linkedin.com, www.facebook.com, Central Registration and Information on Business, the National Court Register.

We process the following personal data for **archiving and evidentiary** purposes:

- first name and surname,
- e-mail address or phone no.
- position,
- your workplace data,
- data from correspondence exchanged between us.

- for the purpose of safeguarding information that may be used to establish facts of legal significance. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the

personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the possession of personal data that will enable to prove certain facts related to your contact with the Company, e.g. the compliance with this information obligation);

We process the following personal data for the purpose of **establishment, exercise or defence against claims**:

- first name and surname,
- e-mail address or phone no.
- position,
- your workplace data,
- data from correspondence exchanged between us.

— for the purpose of defence of the proprietary interest of the Company. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the protection of its proprietary interest).

In order to **comply with the obligations arising from the GDPR**, we may process the following types of your personal data:

- first name and surname,
- e-mail address or phone no.
- other data provided for this purpose.

The legal basis for such processing is Article 6(1)(c) of the GDPR in conjunction with the GDPR, as well as Article 6(1)(f) of the GDPR, which allows for the processing of personal data if, by doing so, the Personal Data Controller pursues its legitimate interests (in this case, the interest of the Company includes, for example, keeping records and registers, as well as having information on individuals who have exercised the rights provided for in the GDPR);

IV. Cookies

1. The Company, similarly to other entities, uses so-called cookies on its website, i.e. short text information saved on a computer, phone, tablet or another user's device. They can be read by our system, as well as by systems belonging to other entities whose services we use (e.g. Facebook, Google, LinkedIn, Instagram).
2. Cookies perform many functions on the website, most often useful, which we will try to describe below (if the information is insufficient, please contact us):
 - **ensuring security** - cookies are used to protect your personal data against unauthorized access, e.g. IP address is stored in them.
 - **impact on the processes and efficiency of website use** - cookies are used to make the website work smoothly and to make use of the functions that it offers, which is possible, among other things, by recording settings between subsequent visits to the website. Therefore they allow you to navigate the website and the individual subpages in an efficient manner;
 - **session status** - cookies often store information about how visitors use the website, e.g.

which subpages they display most often. They also allow you to identify errors displayed on some subpages. Cookies used to store so-called "session status" thus help to improve the service and increase the comfort of browsing;

- **creating statistics** - cookies are used to analyse how users use the website (how many open the website, how long they stay on it, which content arouses most interest, etc.). This enables constant improvement of the website and adaptation of its operation to users' preferences. We use Google tools such as Google Analytics to track activity and compile statistics; to disable Google Analytics, you can withdraw your consent as described in Section 5 of this policy. To disable Google Analytics, you may download and install the appropriate browser plug-in, which is available at the following address: <https://tools.google.com/dlpage/gaoptout?hl=pl&fbclid=IwAR3H667DTSIA7u-3Q7M4oVGr2aXiecyE6IE9bCdTJEKJv1-sByqjuU5c6aU>,
 - **use of social media features** - we have a so-called Facebook, Instagram and LinkedIn pixel on the website, which allows you to like our profiles on these sites when using the website. However, in order for this to be possible, we need to use cookies provided by the indicated entities.
 - **displaying videos** - we use YouTube and Vimeo cookies for this purpose.
3. While we respect the autonomy of all those who use the website, we feel obliged to warn you that disabling or restricting the use of cookies may cause difficulties in using the website, such as longer loading times, restrictions on the use of functionalities, limitations on liking the page on social media sites or the impossibility of viewing videos, etc.

V. Right to withdraw a consent

1. If the processing of your personal data is based on your consent, you may withdraw your consent at any time, at your own discretion.
2. If you would like to withdraw your consent to the processing of your personal data, all you need to do is send an e-mail directly to the Company to the address office@247.com.pl. If the withdrawal of a consent concerns data processing using cookies, you can withdraw your consent here <https://247.com.pl/#ustawienia-cookies>
3. If the processing of your personal data was based on your consent, its withdrawal does not make the processing of your personal data illegal until that moment. In other words, until your consent is revoked, we have the right to process your personal data, and revoking your consent does not affect the lawfulness of processing up to that date.

VI. Requirement to provide personal data

4. The provision of personal data is voluntary and depends on your decision. However, the provision of certain personal data may be necessary in order to send you a response, to exchange correspondence or to perform a contract with a customer or counterparty of the Company that you represent.
5. If your data is required by legal regulations, you are obliged to provide them.

VII. Automated decision making and profiling

We would like to inform you that we will not process your data with the view to automated decision

making, including profiling.

VIII. Personal data recipients

1. Like most entrepreneurs, in our business activity we use the assistance of other entities, which often involves the need to transfer personal data. Therefore, if necessary, we may pass your data to a hosting company, lawyers, social media owners, Microsoft 365 e-mail software provider (if we communicate by e-mail) and if you are communicating with the Company on behalf of our customer or counterparty, to entities involved in the matter in relation to which you contact us, courier companies, or an accounting firm.
2. In addition, we may for example have to pass on your personal data to other entities, whether public or private, on the basis of the applicable law or a decision of a competent authority. Therefore, it is extremely difficult for us to predict who can request personal data. However, for our part, we assure you that we analyse all requests for personal data very carefully and thoroughly so as not to inadvertently pass on the information to an unauthorised person.

IX. Transfer of personal data to third countries

We kindly inform you that we may transfer your data outside the European Economic Area, which is for example related to our cooperation with various entities, e.g. if we use an application provided by a U.S. entity. For our part, we guarantee that the data will be transferred in compliance with all legal requirements, including on the basis of an appropriate agreement containing data protection clauses adopted by the European Commission, thus ensuring an appropriate way to secure the personal data transferred.

X. Period of processing of personal data

1. We do not process your personal data "indefinitely", but for the time necessary to achieve the stated purpose, in accordance with the applicable laws. After this period, your personal data will be irretrievably deleted or destroyed.
2. With regards to the individual personal data processing periods, we kindly inform you that we process your personal data for a period of time:
 - until the consent is withdrawn or until the purpose of the processing is achieved- in the case of personal data processed on the basis of a consent;
 - until the effective objection is raised or the purpose of the processing is achieved (including e.g. expiry of the limitation periods) - with regards to personal data processed on the basis of the legitimate interest of the Personal Data Controller,
 - until they become obsolete or no longer usable, however for no more than 2 years, with regards to personal data processed primarily for analytical purposes, the use of cookies and the administration of the website,
 - until the expiry of the limitation periods, with regards to data processed under tax law.

XI. Rights of data subjects

1. We kindly inform you that you have the right to:
 - access your personal data;
 - rectify your personal data;

- delete your personal data;
 - limit the processing of your personal data;
 - object to the processing of your personal data;
 - transfer your personal data.
2. We respect your rights under data protection laws, and we try to facilitate their implementation as much as possible.
 3. We point out that the above-mentioned rights are not absolute and therefore in some situations we may legally refuse to fulfil them. However, if we refuse to grant a request, it is only after careful analysis and only if it is necessary to refuse to grant the request.
 4. With regards to the right to lodge an objection, we would like to explain that you have the right to object to the processing of your personal data at any time conducted on the basis of the legitimate interest of the Personal Data Controller in relation to your particular situation. Please note, however, that under the law we may refuse to accept an objection if we prove that:
 - there are legitimate grounds for processing which take precedence over your interests, rights and freedoms, or
 - there are grounds for establishing, pursuing or defending claims.

XII. Right to file a complaint

If you believe that your personal data is being processed in violation of the law, you may file a complaint with the President of the Office for the Personal Data Protection.

XIII. Final provisions

1. To the extent not covered by this Privacy Policy, the regulations on personal data protection shall apply.
2. You will be notified of any amendments to this Privacy Policy on the website. Amendments to the Privacy Policy may be made for legal, business, technical or organisational reasons.
3. This Privacy Policy is effective from 29.12.2021.