

PRIVACY POLICY

Soft Power Ltd., based in Wrocław 52-010, ul. Opolska 11-19, Poland, NIP 8943062929, REGON: 361700953, KRS: 0000561255

1. Who is the controller of personal data of natural persons?

Soft Power Ltd, based in Wrocław

2. For what purpose, on what basis and for what period of time we use your personal data?

We use personal data obtained during communication or before concluding a contract or during its duration for the purpose of:

1) conclusion and performance of the contract for the duration of the contract and settlements after its termination or to take action before concluding the contract, if you agree to it (Article 6 (1) b) of the GDPR);

2) fulfilling our legal obligations, e.g. issuing and storing invoices and accounting documents, keeping employee documentation (Article 6 (1) c) of the GDPR);

We will use the data needed to fulfill legal obligations: a) for the duration of the obligations, e.g. issuing an invoice (Article 6 paragraph 1 c) of the GDPR); b) for the period in which the regulations require us to store data, e.g. tax; c) for the period in which we have a legitimate interest, e.g. we may bear the legal consequences of failure to perform the obligation;

3) verification of payment credibility, determination, defense, redress, detection, fraud prevention, compilation, analysis and statistics, which includes, among others sale of our receivables under the contract to another entity, and earlier disclosure of source documents (e.g. contracts) containing personal data, reporting, marketing research, creating statistics (e.g. regarding the protection of revenues) - for the period after which the claims under the contract are time-barred, because we have a legitimate interest;

4) direct marketing - for the duration of the contract, because we have a legitimate interest.

3. What recipients can we provide your data to?

We can provide the data:

1) entities processing data on our behalf, participating in the performance of our activities, e.g.

A) employees, associates, subcontractors who support us in our activities, including those who support our ICT systems, help in the marketing process, and provide services for our client;

B) advisers, consultants, auditors, providing legal, tax and accounting assistance,

C) providing postal, courier and payment activities (banks, payment institutions), buyers of receivables, banks, financial institutions;

2) state authorities in the scope of legal provisions, customers, if it is necessary before concluding the contract or during the performance of the contract.

4. Will your data go outside the European Economic Area (EEA)?

We currently do not plan to transfer your data outside the EEA. But if we decide to transfer data outside the EEA, we will only do so to the extent permitted by law.

5. You have the right to personal data to:

1) rectification, deletion, restriction of processing, access, transfer to another data controller or to you (to the extent specified in Article 20 of the GDPR), objection to processing (including profiling) for the purposes of direct marketing (to the extent specified in Article 21 Rodo), consent. If the use of your data by us is not necessary for the performance of the contract, the fulfillment of a legal obligation or does not constitute our legitimate interest, we may ask for consent to certain methods of using your data, complaints to the President of the Office for Personal Data Protection.

2) after considering your application, it may turn out that we will not be able to process the personal data covered by the objection on this basis, unless we prove that there are legal grounds.

3) In matters related to your data, you can contact us by sending an e-mail to the address ido@t-lem.com This address is used so that you can contact us regarding your data and that you can exercise your rights related to the data provided to us. You have the right to request access to your personal data from us (we will inform you about your

data), rectify it (if you want to correct your data), delete or limit processing (you can select the data we will process or request that we delete all your data) or about the right to object or the right to transfer your data to another entity.

6. Which data should be provided to us?

- 1) to conclude a contract - data on the contract form or in accompanying documents (e.g. specification of the parties to the contract, correspondence address) - if you do not provide them, we may not conclude the contract;
- 2) we require applicants for employment under an employment contract and employees to provide the data specified in the Labor Code;
- 3) additionally, we may ask for optional data that do not affect the conclusion of the contract (if we do not receive them, we will not be able to call the contact number, for example).
- 4) providing some data at the conclusion of the contract is not a statutory requirement (with exceptions specified in legal provisions, e.g. the Labor Code), but without providing the data, for example, we would not be able to perform the contract or it would be significantly difficult.

7. Categories regarding personal data, in the case of obtaining personal data in a way other than from the person to whom they relate.

Depending on the type of person and the legal relationship: eg Tax Identification Number, Social Security Number, address of residence, contact details (telephone, e-mail, or other communicator), names, surnames, access cards, address of the main place of business.

8. Data from other sources.

- 1) If you pay through, for example, a bank or payment institution, we will get information about the account, in which institution, you made the payment. We will process this data in order to check whether you have made the correct payment, and if necessary, also to make refunds (basis: performance of the contract), to establish, assert and defend claims and for the purposes of creating statistics and analyzes (basis: our legitimate interest).
- 2) some data may come from publicly available sources (e.g. published in the National Court Register on government websites or in other publications).

9. Automated decision making.

We can automatically make decisions, including profiling, in the case of:

- 1) when expressly permitted by Union or Member State law, including decisions for the purposes of monitoring, preventing and responding to fraud;
- 2) to ensure the security and reliability of the services provided by the administrator (e.g. device location data, analytical tools, including anti-virus programs, cookies, etc.), or
- 3) when it is necessary for the conclusion or performance of a contract between the data subject and the administrator, including the establishment, defense and redress; lu
- 4) additionally, when the data subject has expressly consented to it.

Such processing will always be subject to appropriate safeguards. You have the right to obtain human intervention, to express your own position, to obtain an explanation of the decision resulting from such an assessment and to challenge such a decision, and then the matter will be considered by a competent person.

10. Cookie Policy.

Cookies - small text information sent by a web server and saved on the user's side. The default parameters of cookies allow the information contained in them to be read only by the server that created them. Cookies are most often used to monitor the activity of visitors to our website ("Website"). Cookies usually contain the name of the website they come from, the storage time on the end device, e.g. on the hard drive, and the data assigned to them (such as session numbers).

1. The entity that places cookies on the Website user's end device and obtains access to them is:

- Soft Power Ltd based in Wrocław
- cooperating service and advertising companies (so-called third party cookies).

2. The use of cookies is aimed at:

- adjusting the content of the Website pages to the user's preferences and optimizing the use of websites; in particular, these files allow to recognize the device of the Website user and properly display the website, tailored to his individual needs;
- creating statistics that help to understand how Website users use websites, which allows them to be improved;
- maintaining the Website user's session and ensuring the operation of all Website functions;
- providing users with advertising content tailored to their interests and needs

3. The Website uses three main types of cookies:

- session cookies - session cookies: temporary files that are stored on the user's end device until logging out, leaving the website or turning off the software (web browser).
- persistent cookies - permanent: they are stored on the user's end device for the time specified in the cookie file parameters or until they are deleted by the user.
- third parties cookies - external entities: files from, for example, various advertising servers, company servers and service providers (for example maps placed on the website, social networking sites, etc.) cooperating with the owner of a given website. These files allow you to customize advertisements, thanks to which the use of websites can be adapted to the preferences and habits of users. They also allow you to evaluate the effectiveness of advertising activities (e.g. by counting how many people clicked on a given advertisement and went to the advertiser's website). The information contained in cookies of external entities is managed by a given external entity, which sets them in accordance with its privacy policy.

4. The Website uses the following types of cookies:

- "necessary" cookies, enabling the use of services available on the Website, e.g. cookie authentication files used for services that require authentication on the Website, cookies used to maintain user sessions;
- "functional" cookies, making it possible to remember the settings selected by the User and personalize the user interface, e.g. in terms of the language or region of the User, font size, website color, website appearance, etc .;
- "performance" cookies, enabling the collection of information on the use of the Website pages;
- "advertising" cookies, enabling users to provide advertising content tailored, for example, to their interests.

5. In most cases, the software used for browsing websites (eg internet browsers) allows cookies to be stored on the user's end device by default. Website users can change cookie settings at any time and at any time on their device or in the software. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform the user each time they are placed on the Website user's device. Detailed information on the possibility of handling cookies is available in the software settings (e.g. of the web browser).

6. The Website Administrator informs that changing the settings in the software (eg in the web browser) of the use of cookies may affect some of the functionalities available on the Website's pages.

7. Cookies placed on the Website user's end device may also be used by advertisers and partners cooperating with the Website operator.

8. More information on cookies is available in the Help tab in the web browser.