#### § 1 Definitions

- Controller INCREDEVO LIMITED LIABILITY COMPANY, located at Ksawerów 3, 02-656 Warsaw. KRS: 0000904796, NIP 8992900371.
- GDPR Regulation of the European Parliament and of the Council (EU) 2016/679 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.
- 3. User any natural person visiting the Website or using one or more services or functionalities described in the Policy or services of the Controller.

# § 2

## Data processing

- The website located at incredevo.com, hereinafter referred to as "the Service," is owned and maintained by the Controller. The email address for contact regarding the Service is info@incredevo.com.
- By using the Service, the User agrees to use it solely in a manner compliant with applicable law, social coexistence rules, and respecting intellectual property rights. Specifically, the User has no right to distribute, copy, or edit texts and graphics posted within the Service.
- In connection with the User's use of the Service, the Controller collects data necessary for providing individual services. Below are the detailed rules and purposes of processing personal data collected during the User's use of the Service.

#### § 3

#### Purposes and legal bases for data processing

- 1. Personal data of all Users using the Service (entered independently by the User in form fields) are processed by the Controller:
  - a. to provide electronic services regarding making content available to Users on the Service – the legal basis for processing is the necessity of processing to perform the contract (Art. 6(1)(b) GDPR);
  - b. to provide other services by the Controller the legal basis for processing is the necessity of processing to perform the contract (Art. 6(1)(b) GDPR);
  - c. for analytical and statistical purposes the legal basis for processing is the legitimate interest of the Controller (Art. 6(1)(f) GDPR) consisting of conducting

analyses of User activity and their preferences to improve functionalities and services offered;

- d. to potentially establish and pursue claims or defend against them the legal basis for processing is the legitimate interest of the Controller (Art. 6(1)(f) GDPR) consisting of the protection of its rights;
- e. to send commercial information the legal basis for processing is the legal interest of the Controller based on the User's consent under Telecommunications Law regulations (Art. 6(1)(f) GDPR);
- 2. The User's activity on the Service, including their personal data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and actions regarding the IT system used to provide services by the Controller). Information collected in logs is processed mainly for purposes related to service provision. The Controller also processes it for technical, administrative purposes, for ensuring the security of the IT system and its management, as well as for analytical and statistical purposes in this respect, the legal basis for processing is the legally justified interest of the Controller (Art. 6(1)(f) GDPR). The Controller may make automated decisions about the data provided by the User, for remarketing and profiling purposes; in this case, the legal basis for processing is the legally justified interest of the User has the legally justified interest of the processing of their data in this regard.

#### § 4

#### **Processing of User Data**

Within the Service, the User's data is processed by entities cooperating with the Controller, which, in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 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, are required to adhere to high standards of privacy similar to those contained in the Policy. The transfer of data outside the EEA does not occur.

#### § 5

#### Period of personal data processing

 The period of data processing by the Controller depends on the type of service provided and the purpose of processing. As a general rule, data is processed for the duration of the service provision or order fulfillment, until the withdrawal of consent or the filing of an effective objection to data processing in cases where the legal basis for processing is the legitimate interest of the Controller. 2. The processing period may be extended if processing is necessary to establish and pursue potential claims or defend against them, and thereafter only to the extent required by law. After the processing period, data is irreversibly deleted or anonymized.

## § 6

#### User rights

- 1. The User has the right to:
  - a. access the content of their data and request its rectification,
  - b. delete data,
  - c. restrict processing,
  - d. the right to data portability,
  - e. the right to object to data processing,
  - f. the right to lodge a complaint with the supervisory authority the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.
- 2. To the extent that the User's data is processed based on consent, this consent can be withdrawn at any time by contacting the Controller.
- 3. The User has the right to object to the processing of data for marketing purposes if the processing is related to the legitimate interest of the Controller, and also for reasons related to the User's particular situation in other cases where the legal basis for data processing is the legitimate interest of the Controller (e.g., in connection with the realization of analytical and statistical purposes).

### § 7

#### Data recipients

- In connection with the provision of services, personal data will be disclosed to external entities, including in particular providers responsible for operating IT systems, marketing agencies (in the scope of marketing services) and entities related to the Controller.
- 2. With the User's consent, their data may also be made available to other entities or partners of the Controller for their own purposes, including marketing purposes.
- 3. The Controller reserves the right to disclose selected information about the User to the appropriate authorities or third parties who request such information, based on the appropriate legal basis and in accordance with the provisions of applicable law.

#### § 8

#### Contact

Contact with the Controller is possible via email at info@incredevo.com or in writing at the Controller's registered office address.

## § 9

## **Changes to the Privacy Policy**

The Policy is regularly reviewed and updated as necessary. The current version of the Policy was adopted and is effective from 06.06.2021.