

## PRIVACY POLICY OF THE NUBINNO CONNECT PORTAL

[www.nubinnconnect.com](http://www.nubinnconnect.com) (“Website”)

### Dear User!

We care about your privacy and want you to feel comfortable using our services. Therefore, below, we present the most essential information on the policy for the processing of your personal data and on cookies that are used by our Website. This information has been prepared concerning the GDPR, i.e. the general data protection regulation.

### PERSONAL DATA CONTROLLER

NUBINNO CONNECT spółka z ograniczoną odpowiedzialnością (“limited liability company”) with its seat in Warsaw, Poland, a company established on the laws of the Republic of Poland, 2nd Floor, 208 Grojecka Str., 02-390 Warsaw, Poland, entered in the Register of Entrepreneurs of the National Court Register by the District Court for the capital city of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under KRS number: 0001014111, NIP (tax identification number) 7011125128, REGON (entrepreneur’s statistical number) 524216705, with the share capital of 10.000 PLN

If you wish to contact us concerning our processing of your personal data, please email us at [support@nubinnconnect.com](mailto:support@nubinnconnect.com).

### YOUR RIGHTS

You have the right to request:

- access to your personal data, including obtaining a copy of your data (Article 15 of the GDPR or, if applicable, Article 13 sec. 1(f) of the GDPR),
- their rectification (Article 16 of the GDPR),
- erasure (Article 17 of the GDPR),
- restriction of their processing (Article 18 of the GDPR),
- the transfer of data to another controller (Article 20 of the GDPR);

and the right to:

object to the processing of your personal data at any time:

- on grounds relating to your particular situation - concerning processing your personal data based on Article 6 sec. 1(f) of the GDPR (i.e. the legitimate interests pursued by us), including profiling;
- if your personal data is processed for the purposes of direct marketing, including profiling, to the extent that such processing is related to such direct marketing (Art. 21 sec. 2 of the GDPR).

Contact us if you wish to exercise your rights. You can object to our use of cookies (which you will read about below) by using the appropriate settings on your browser.

If you consider that your data is being processed unlawfully, you can lodge a complaint with the competent data protection authority.

## PERSONAL DATA AND PRIVACY

We process your data for purposes related to the Website's operation and the provision of the services offered therein. Below, you will find detailed information on processing your data depending on your activities.

### 1. Use of the free services offered on the Website

<b>For what purpose do we process your data?</b>
to execute the contract for services provided on the Website
<b>On what basis do we process your data?</b>
a contract for the provision of services (Article 6 sec. 1(b) of the GDPR)
<b>For how long will we process your data?</b>
for the contract period
in addition, your data will be processed until the expiry of the period during which claims may be asserted – either by you or by us (see the last table of this part for more information)
<b>What happens if you do not provide the data?</b>
you will not be able to use our services

### 2. Use of the paid services offered on the Website

<b>For what purpose do we process your data?</b>
to execute the contract for services offered on the Website
<b>On what basis do we process your data?</b>

a contract for the provision of services (Article 6 sec. 1(b) of the GDPR)	legal obligation obliging us to process your personal data (Article 6 sec. 1(c) of the GDPR)
<b>For how long will we process your data?</b>	
for the contract period	until the expiry of our legal obligation related to accounting
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
you will not be able to use our services	

### 3. Taking part in a satisfaction survey about our services provided in connection with the Website

<b>For what purpose do we process your data?</b>
improving the quality of our services thanks to the feedback provided by Users
<b>On what basis do we process your data?</b>
our legitimate interest in processing your data to conduct surveys of your satisfaction with our services (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
30 days or until we take account of your objection to the processing *
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)
<b>What happens if you do not provide the data?</b>
we will not take your opinion on our services into account in the further development of our services

\*whichever is applicable in a particular case

#### 4. Contacting us (e.g. to ask a question)

<b>For what purpose do we process your data?</b>	
to respond to your inquiries or requests	
<b>On what basis do we process your data?</b>	
a contract or actions taken at your request before entering into a contract (Article 6 sec. 1(b) of the GDPR) - if your enquiry or request relates to a contract to which we are or may be a party	our legitimate interest in processing your data to communicate with you (Article 6 sec. 1(f) of the GDPR) - if your enquiry or request is not related to a contract
<b>For how long will we process your data?</b>	
for the duration of the contract binding us or, if no contract is concluded - until the expiry of the claim period - see the last table of this part	until the expiry of the claim period - see the last table in this part or until we have taken account of your objection to the processing*
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
we will not be able to respond to your enquiry or request	

\*whichever is applicable in a particular case

#### 5. Browser settings or other similar actions allowing marketing activities

<b>For what purpose do we process your data?</b>
for the purposes of direct marketing through the display of personalised advertising (read more in the "Profiling" and "Cookies" parts of the Privacy Policy)
<b>On what basis do we process your data?</b>
our legitimate interest in processing the data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
until the cookies used for marketing purposes expire or are deleted by you*

<b>What happens if you do not provide the data?</b>
you will not receive suggestions for products or services in which you may be interested

\*whichever is applicable in a particular case

## 6. Browser settings or other similar actions allowing analytical activities

<b>For what purpose do we process your data?</b>
To analyse how you use and navigate through the Website to improve its functionality (read more in the "Analytics" and "Cookies" parts of our Privacy Policy)
<b>On what basis do we process your data?</b>
our legitimate interest in processing the data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
until the cookies used for analytical purposes expire or are deleted by you*
<b>What happens if you do not provide the data?</b>
we will not take into account the way you use and navigate through the Website when working on its development

\*whichever is applicable in a particular case

## 7. Your consent to receive marketing content from us (e.g. information on special offers)

<b>For what purpose do we process your data?</b>	
to send marketing information, especially special offers	to analyse the effectiveness of our messages, to establish general principles for effective messaging in our business activity (read more in the "Analytical activities" part of the Privacy Policy)
<b>On what basis do we process your data?</b>	
your consent to our marketing activities (Article 6 sec. 1(a) of the GDPR),	our legitimate interest in processing the data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)

<b>For how long will we process your data?</b>	
until you withdraw your consent – remember, you can withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.	until we have taken account of your objection to the processing
in addition, your data will be processed until the expiry of the period during which claims may be asserted – either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
you will not receive our marketing materials, including information about our special offers	

### 8. Entering into a contract to provide a free newsletter and bonus digital content

<b>What for?</b>	
to execute the contract for the provision of a free newsletter and bonus digital content	to analyse the effectiveness of the messages we send, to establish general principles for effective messaging and to offer free content in our business activity (read more in the "Analytical activities" part of the Privacy Policy)
<b>On what basis?</b>	
a contract for the provision of a free newsletter and bonus digital content (Article 6 (1) (b) of the GDPR),	our legitimate interest in processing the data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long?</b>	
for the contract period	until we have taken account of your objection to the processing
in addition, your data will be processed until the expiry of the period during which claims may be asserted – either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide your data?</b>	
you will not be able to receive information regarding the Website and our services; also, you will not receive any digital content	

## 9. Any act or omission which may give rise to a claim relating to the Website or our services

<b>For what purpose do we process your data?</b>
To establish, assert or defend possible claims relating to the contract concluded or the services provided
<b>On what basis do we process your data?</b>
our legitimate interest to process your personal data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
until the expiry of the claim period or until we take account of your objection to the data processing*
<b>What happens if you do not provide the data?</b>
inability to establish, assert or defend claims

\*whichever is applicable in a particular case

### PROFILING

On the Website, we carry out profiling - we will profile you if you allow such activities. This profiling automatically assesses what products or services you may be interested in, using information about the content you view. In this way, advertisements for products or services displayed as part of online services used by the User will be more tailored to you and your needs.

The profiling we perform does not result in decisions that produce legal effects for you or affect you in a similarly significant way.

### ANALYTICAL ACTIVITIES

As part of the Website, we perform analytical activities to make it more intuitive and accessible - we will do so if you allow such activities. As part of the analysis, we will consider how you navigate the Website, for example, how much time you spend on a particular subpage or where on the Website you click. This allows us to optimise the layout, appearance and content of the Website as we work on its development to improve its functionality.

In addition, if you wish to receive marketing messages or newsletters from us, we may analyse the effectiveness of the mailing we have conducted. For example, we can check whether and how it affected activity on our Website. Such activities will help us establish general rules for sending such messages and offers within our business activity - for example, in terms of optimal sending hours or determining how to formulate effective content.

## **DATA SECURITY**

When processing your personal data, we use organisational and technical means under the applicable law, including the encryption of the connection using the SSL/TLS protocol.

## **COOKIES**

Our Website, like most websites, uses the so-called cookies. These cookies:

- are saved in the memory of your device (computer, telephone, etc.);
- do not change the settings of your device.

On our Website, cookies are used for:

- statistical purposes,
- marketing purposes,
- making the Website functions available.

To learn how to manage cookies, including how to turn them off in your browser, you can use your browser's help file. You can find out more about this by pressing F1 in your browser. In addition, appropriate tips can be found on the following pages, depending on the browser you are using:

- [Google Chrome](#),
- [Opera](#),
- [Safari](#),
- [Mozilla Firefox](#),
- [Microsoft Edge](#).

Cookies will not be processed by us for more than 15 minutes.

Using the appropriate options of your browser, you can at any time:

- delete cookies,
- block the use of cookies in the future.

In such cases, we will no longer process them.

## **EXTERNAL SERVICES / DATA RECIPIENTS**

We use external services to help us in our business. We entrust them with processing your data - these processors only process data upon our documented request.



Below you will find a list of the recipients of your data:

<b>ACTION</b>	<b>DATA RECIPIENTS</b>	<b>TRANSFERS OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION</b>
<b>any action connected with the Website</b>	hosting provider	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
	entity providing us with technical/IT support	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
	persons cooperating with us based on civil law contracts, supporting our current activities	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
<b>visiting the Website with settings that allow analytical activities to be carried out</b>	entity enabling analytical activities on the Website	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
<b>use of the paid services offered on the Website</b>	accounting office	does not take place
	legal advisors	does not take place
	provider of the business facilitation software (e.g. accounting software)	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
	provider of the standard office software (including email boxes)	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
<b>use of the free services offered on the on the Website</b>	provider of the standard office software (including email boxes)	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **

<b>subscribing to the newsletter or consent to marketing</b>	entity providing newsletter or marketing messaging services	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
<b>use of the online chat available on the Website</b>	provider of the online chat available on the Website	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **
<b>contacting us (e.g. to ask a question)</b>	provider of the standard office software (including email boxes)	yes – the USA, China, Singapore, the United Kingdom, Switzerland, Canada, Argentina, Israel, New Zealand **

Additionally:

relevant public authorities to the extent that we are required to provide them with the data.

#### **TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION**

\*\* As such, your personal data may also be processed by entities outside the European Union. An adequate level of protection of your data, including through the application of appropriate safeguards, is ensured by:

- the participation of these entities in the Data Privacy Framework, a program established by the implementing decision of the European Commission as a set of principles that guarantee adequate privacy protection – in the case of entities from the United States,
- the standard data protection clauses adopted by the European Commission as referred to in Article 46 sec. 2(c) of the GDPR – in the case of China and Singapore,
- Commission Implementing Decision of 28.6.2021 according to Regulation (EU) 2016/679 of the European Parliament and the Council on the adequate protection of personal data by the United Kingdom Commission Decision No 2000/518/EC on the adequate protection of personal data in Switzerland Commission Decision No 2002/2/EC on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act,
- Commission Decision No 2003/490/EC on the adequate protection of personal data in Argentina Commission Decision No 2011/61/EU on the adequate protection of personal data by the State of Israel concerning automated processing of personal data,
- Commission Implementing Decision No 2013/65/EU on the adequate protection of personal data in New Zealand.