

PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Controller** - Centrum Elektronicznych Usług Płatniczych eService Sp. z o. o. with its registered office in Warsaw (01-102) at ul. Jana Olbrachta 94.
- 1.2. **Personal data** - any information relating to a natural person identified or identifiable by one or more factors specific to **the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person**, including the device's IP, location data, an online identifier and information collected through cookies and another similar technology.
- 1.3. **Policy** - this Privacy Policy.
- 1.4. **EU GDPR** - European Union General Data Protection Regulation 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.
- 1.5. **Website** - a website maintained by the Controller at the address (local mutation).
- 1.6. **User** - any natural person visiting the Website or using one or several services or functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

- 2.1. In connection with the use of the website by the User, the Controller collects data in the scope necessary to provide particular services offered, as well as information on the User's activity on the Website. The detailed principles and purposes of processing personal data collected during the use of the Website by the User are described below.

3. GOALS AND LEGAL GROUNDS FOR PROCESSING OF DATA ON THE WEBSITE

USE OF THE WEBSITE

- 3.1. Personal data of all persons using the Website (including the IP address or other identifiers and information collected via cookies or other similar technologies) but who are not registered Users (i.e. persons without a profile on the Website) are processed by the Controller:

- 3.1.1. in order to provide services by electronic means in the scope of making content collected on the Website available to Users - in which case the legal basis for processing is the necessity to process in order to perform the contract (Article 6.1.b EU GDPR);
 - 3.1.2. for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest pursued by the Controller (Article 6.1.f of the EU GDPR) concerning the analysis of Users' activity, as well as their preferences in order to improve the functionalities and services provided;
 - 3.1.3. in order to establish or assert any claims or to defend against such claims in which case the legal basis of the processing is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR) concerning the protection of his rights;
 - 3.1.4. for marketing purposes of the Controller and other entities, in particular those related to the presentation of behavioural advertising - the principles of processing personal data for marketing purposes are described in the 'MARKETING' section.
- 3.2. The User's activity on the Website, including his or her personal data, is recorded in system logs (a special computer application used for storing a chronological record containing information on events and activities regarding the IT system used to provide services by the Controller). Information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes them for technical and administrative purposes, for the purpose of ensuring the security of the IT system and management of this system, as well as for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR).

REGISTRATION ON THE WEBSITE

- 3.3. The persons who register on the Website are requested to provide the data necessary to create and service the account. In order to facilitate the service, the User may provide additional data, thereby agreeing to their processing. Such data can be deleted at any time. Providing data marked as mandatory is required to set up and service the account, and failure to do so results in the inability to set up the account. Providing additional data is voluntary.
- 3.4. Personal data are processed:
- 3.4.1. in order to provide services related to maintenance and service of the account on the Website - in which case the legal basis for processing is the necessity of processing in order to perform the contract (Article 6.1.b of the EU GDPR), and in the matter of optional data - the legal basis for processing is consent (Article 6.1.a of the EU GDPR);
 - 3.4.2. for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest pursued by the Controller (Article 6.1.f of the EU GDPR) involving the analysis of Users' activity on the Website and the manner of use of the account, as well as their preferences in order to improve the functionalities provided;

- 3.4.3. in order to establish or assert any claims or to defend against such claims in which case the legal basis of the processing is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR) concerning the protection of his rights.
- 3.4.4. for marketing purposes of the Controller and other entities - the principles of processing personal data for marketing purposes are described in the 'MARKETING' section.
- 3.5. The account on the Website can also be logged into through social networks (Facebook, G+, Instagram, Twitter). In this case, the Website will collect from the User's account on the social network only the data necessary for registration and account service. By individually changing the plug-in settings, the User can easily extend the scope of collected data with those that may be useful when using the Website account's functionalities.
- 3.6. If the User places any personal data of other persons on the Website (including their name, address, telephone number or e-mail address), he or she can do so only on condition that this is not in violation of applicable law and personal rights of those persons.

SUBMISSION OF ORDERS (USE OF PAID SERVICES ON THE WEBSITE)

- 3.7. Placing an order (purchase of goods or services) by the Website's User involves the processing of his or her personal data. Providing data marked as mandatory is required to accept and service the order, and failure to do so results in the inability to process the order. Providing additional data is voluntary.
- 3.8. Personal data are processed:
 - 3.8.1. in order to process the order - in which case the legal basis for processing is the necessity of processing in order to perform the contract (Article 6.1.b of the EU GDPR); and in the matter of optional data the legal basis for processing is consent (Article 6.1.a of the EU GDPR);
 - 3.8.2. in order to fulfil statutory obligations imposed on the Controller, resulting in particular from tax regulations and accounting regulations - in which case the legal basis for processing is compliance with a legal obligation (Article 6.1.c of the EU GDPR);
 - 3.8.3. for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest pursued by the Controller (Article 6.1.f of the EU GDPR) involving the analysis of Users' activity on the Website, as well as their shopping preferences in order to improve the functionalities used;
 - 3.8.4. in order to establish or assert any claims or to defend against such claims in which case the legal basis of the processing is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR) concerning the protection of his rights.

CONTACT FORMS

- 3.9. The Controller provides the opportunity to contact him by means of electronic contact forms. The use of the form requires providing personal data necessary to contact the User and reply to the inquiry. The user may also provide other data to facilitate contact or process of the inquiry. Providing data marked as mandatory is required to receive and process the inquiry, and failure to do so results in the inability to process the inquiry. Providing additional data is voluntary.
- 3.10. Personal data are processed:
- 3.10.1. in order to identify the sender and process his inquiry sent via the provided form - in which case the legal basis for processing is the necessity of processing in order to perform the contract for the provision of the service (Article 6.1.b of the EU GDPR);
 - 3.10.2. for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest pursued by the Controller (Article 6.1.f of the EU GDPR) which concerns keeping statistics of inquiries submitted by Users via the Website in order to improve the functionality.

4. MARKETING

- 4.1. The Controller processes Users' personal data in order to perform marketing activities which may consist of:
- 4.1.1. displaying marketing content that is not adapted to the User's preferences (contextual advertising);
 - 4.1.2. displaying marketing content corresponding to the User's interests (behavioural advertising);
 - 4.1.3. directing e-mail notifications about interesting offers or content that in some cases contain commercial information (newsletter service);
 - 4.1.4. conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means and telemarketing activities)
- 4.2. In order to implement marketing activities, in some cases the Controller uses profiling. This means that due to the automatic processing of data, the Controller evaluates selected factors concerning natural persons in order to analyse their behaviour or to create a forecast for the future.

CONTEXTUAL ADVERTISING

- 4.3. The Controller processes User's personal data for marketing purposes in connection with targeting contextual advertising at the Users (i.e. advertising that does not match the User's

preferences). The processing of personal data takes place then in connection with the implementation of the legitimate interests pursued by the Controller (Article 6.1.f of the EU GDPR).

BEHAVIORAL ADVERTISING

- 4.4. The Controller and his trusted partners process Users' personal data, including personal data collected via cookies and other similar technologies, for marketing purposes in connection with the targeting of behavioural advertising at the Users (i.e. advertising tailored to the User's preferences). The processing of personal data also includes profiling of Users. The use of personal data collected through this technology for marketing purposes, in particular within the scope of promotion of third-party goods and services, requires the User's consent. This consent may be withdrawn at any time.

NEWSLETTER

- 4.5. The Controller provides the newsletter service on the terms set out in the terms and conditions to the persons who provided their e-mail address for this purpose. Providing data is required for the provision of the newsletter service, and failure to do so results in the inability to send it.
- 4.6. Personal data are processed:
- 4.6.1. in order to provide the newsletter service, in which case the legal basis for processing is the necessity of processing in order to perform the contract (Article 6.1.b of the EU GDPR);
 - 4.6.2. in case of sending marketing content to the User as part of the newsletter in which case the legal basis of the processing, including profiling, is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR) in connection with the expressed consent to receive the newsletter;
 - 4.6.3. for analytical and statistical purposes - in which case the legal basis for processing is the legitimate interest pursued by the Controller (Article 6.1.f of the EU GDPR) involving the analyses of Users' activity on the Website in order to improve the functionalities used;
 - 4.6.4. in order to establish or assert any claims or to defend against such claims in which case the legal basis of the processing is the legitimate interest of the Controller (Article 6.1.f of the EU GDPR).

DIRECT MARKETING

- 4.7. The User's personal data may also be used by the Controller, to direct marketing content to the User through various channels, i.e. via e-mail, by MMS/SMS or by phone. Such actions are taken by the Controller only if the User has expressed consent, which he can withdraw at any time.

5. SOCIAL MEDIA

- 5.1. The Controller processes personal data of Users visiting the Controller's profiles on social media (Facebook, YouTube, Instagram, Twitter). The data are processed only in connection with maintaining the profile, including informing Users about the Controller's activity and to promote various types of events, products and services. In this case the legal basis for the processing of personal data by the Controller is his legitimate interest (Article 6.1.f of the EU GDPR) concerning the promotion of the brand.

6. COOKIES AND SIMILAR TECHNOLOGY

- 6.1. Cookies are small text files installed on the device of the User who is browsing the Website. Cookies collect information that facilitates the use of the website - for example, by memorising the User's visits to the Website and his activities on it.

'WEBSITE' COOKIES

- 6.2. The Controller uses the so-called website cookies primarily to provide the User with services provided by electronic means and to improve the quality of these services. Therefore, the Controller and other entities providing analytical and statistical services on behalf of the Controller use cookies by storing information or accessing information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:
 - 6.2.1. cookies with data entered by the User (session ID) for the duration of the session (user input cookies);
 - 6.2.2. authentication cookies used for services that require authentication for the duration of the session (authentication cookies);
 - 6.2.3. cookies used to ensure security, e.g. used to detect abuse in the field of authentication (user centric security cookies);
 - 6.2.4. session cookies for multimedia players (e.g. flash player cookies), for the duration of the session (multimedia player session cookies);
 - 6.2.5. permanent cookies used to personalise the User interface for the duration of the session or for a while longer (user interface customisation cookies),
 - 6.2.6. cookies used to monitor traffic on the website, i.e. data analytics, including Google Analytics cookies (these are files used by Google to analyse the use of the Website by the User, to create statistics and reports on the operation of the Website). Google does not use the collected data to identify the User. Neither does it link this information to enable identification. Detailed information about the scope and rules of data collection

in connection with this service can be found at:
<https://www.google.com/intl/pl/policies/privacy/partners>.

'MARKETING' COOKIES

- 6.3. The Controller and his trusted partners also use cookies for marketing purposes, among others, in connection with the targeting of behavioural advertising at the Users. For this purpose, the Controller and his trusted partners store information or access information already stored in the User's telecommunications terminal device (computer, telephone, tablet, etc.). The use of cookies and personal data collected through them for marketing purposes, in particular as regards the promotion of third-party goods and services, requires the User's consent. This consent may be withdrawn at any time.

7. PERIOD OF PERSONAL DATA PROCESSING

- 7.1. The period of data processing by the Controller depends on the type of service provided and the purpose of the processing. In cases where the legal basis for data processing is the Controller's legitimate interest, as a rule, the data are processed during the time the service is provided, or when the order is being processed, until consent is withdrawn or the effective opposition to data processing is filed.
- 7.2. The processing period may be extended should the processing of personal data be necessary to establish or assert any claims or to defend against such claims, after which time it is only possible in the event and to the extent required by law. After the end of the processing period, the data are irreversibly deleted or anonymised.

8. USER'S RIGHTS

- 8.1. The User has the right: of access to the data content, to rectification, to erasure, to restriction of processing, to data portability and to object to processing of personal data and also the right to lodge a complaint with the supervisory body for personal data protection.
- 8.2. To the extent that User's data are processed on the basis of consent, it may be withdrawn at any time by contacting the Controller or using the functionalities made available on the Website.
- 8.3. The User has the right to object to processing of data for marketing purposes if the processing takes place in relation to the Controller's legitimate interest and also in other cases for reasons related to the User's particular situation where the legal ground for data processing is the Controller's legitimate interest (e.g. in connection with the implementation of analytical and statistical objectives).
- 8.4. More information on the rights resulting from the EU GDPR can be found [here](https://www.eservice.pl/fileadmin/pictures/user_upload/Transparency_Policy_2018.pdf) (https://www.eservice.pl/fileadmin/pictures/user_upload/Transparency_Policy_2018.pdf).

9. RECIPIENTS OF DATA

- 9.1. In connection with the provision of services, personal data will be disclosed to third parties, including in particular suppliers responsible for the operation of IT systems, entities such as banks and payment operators, entities providing accounting services, couriers (in connection with processing an order), marketing agencies (in the scope of marketing services) and entities affiliated to the Controller, including companies from its corporate group.
- 9.2. If the User gives consent, his data may also be made available to other entities for their own purposes, including marketing purposes.
- 9.3. The Controller reserves the right to disclose selected information about the User to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with the applicable law.

10. DATA TRANSFER OUTSIDE THE EEA

- 10.1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Controller shall transfer personal data outside the EEA only when it is necessary and with an adequate level of protection, primarily through:
 - 10.1.1. cooperation with personal data processing entities in countries for which an appropriate decision of the European Commission has been issued;
 - 10.1.2. the use of standard contractual clauses adopted by the European Commission;
 - 10.1.3. the use of binding corporate rules adopted by the supervisory authority;
 - 10.1.4. in the event of data transfer to the USA - cooperation with entities participating in the Privacy Shield programme, approved by the European Commission decision.
- 10.2. The Controller shall always inform the data subject about the intention to transfer personal data outside the EEA at the stage of data collection.

11. SECURITY OF PERSONAL DATA

- 11.1. The Controller conducts on-going risk analysis to ensure that personal data are processed in a secure manner - ensuring, above all, that only authorised persons have access to the data and only to the extent that it is necessary due to the tasks performed by them. The Controller makes sure that all operations on personal data are registered and made only by authorised employees and associates.

- 11.2. The Controller undertakes all necessary actions to ensure that subcontractors and other cooperating entities guarantee appropriate security measures whenever they process personal data on behalf of the Controller.

12. CONTACT DETAILS

- 12.1. The Controller can be contacted by e-mail at gdpr@eservice.com.pl or by regular mail at Centrum Elektronicznych Usług Płatniczych Spółka z ograniczoną odpowiedzialnością, 01-102 Warszawa, ul. Jana Olbrachta 94, Poland.
- 12.2. The Controller has appointed a Data Protection Officer who can be contacted by e-mail at iod@eservice.com.pl on any matter regarding personal data processing.

13. CHANGES TO THE PRIVACY POLICY

- 13.1. The policy is verified on a regular basis and updated if necessary. The current version of the Policy has been adopted and is in force as of 24/05/2018.