

Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K.

PRIVACY POLICY

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I. Introduction - Contact details

This Privacy Policy contains general information concerning the use (processing) of personal data of current and potential Clients by Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K. ("VERBA-TEXT", "we", "our"), including persons visiting VERBA-TEXT websites or individual brand websites (hereinafter collectively referred to as "Users").

We respect the privacy of our Users and therefore we provide this Privacy Policy so that each User knows the extent to which their personal data is being processed, including the ability to independently, knowingly and freely decide whether or not to use our services.

As part of this Privacy Policy, we have decided to outline, in general terms, how and to what extent we collect your personal information, what purpose does the data serve, with whom we share it and how we protect it. In the Privacy Policy, the User will also find information about Users' rights.

The policy is of a general nature and selectively presents only a portion of the issues. The details of this policy are contained in individual regulations of websites managed on behalf of VERBA-TEXT and information clauses, which the User will receive when his/her personal data is being collected while using each individual service, subscriptions (newsletters), contact forms (valuation, request for contact, request for proposal), competitions, promotional actions, events, etc. All rights of the data subjects and the rules for their processing shall be based on GDPR, as indicated below.

VERBA-TEXT contact details:

Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K. with its registered office in Warsaw (02-793), street name: Belgradzka 4 apt. 13, entered in the Register of Entrepreneurs kept by the District Court in Warsaw, XIII Commercial Division, under KRS number 0000556604, NIP number 951-239-23-96, REGON number 36147817600000.

Contact details of the VERBA-TEXT Data Protection Officer:

E-mail: biuro@verba-text.pl

Address: Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K Warsaw (02-793), street name: Belgradzka 4 apt. 13, with the indication "DPO".

II. Personal data protection regulations

The VERBA-TEXT Privacy Policy refers to the following personal data protection regulations:

- act of 29 August 1997 on the protection of personal data (Dz. U. of 2016, item 922) (valid until 25 May 2018)
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation) ((OJ No L 119, p.1) - hereinafter referred to as "GDPR" (applicable from 25 May 2018, along with amended national regulations)

III. Policy regarding processing your personal data

We appreciate the trust our Users place in us. As part of the processing of personal data of Users, we pay attention to the fact that such data is processed in a safe, reliable, legal and transparent manner.

The most crucial principles we follow are presented below:

- We collect personal information only to the minimum extent necessary to fulfill the purposes for which it is collected.
- The objectives of collecting our Users' personal data are clearly defined, based on legal regulations - we do not process the data in a manner inconsistent with these objectives.
- We take care of the timeliness and correctness of the Users' personal data and we respond promptly to any requests for data rectification or updating.
- We exercise your right to access and rectify your personal information.
- We also exercise the Users' rights to delete their personal data, withdraw their consent, restrict the processing, to transfer the data, to object to the processing of the data, to not be subject to a decision based solely on automated data processing, including profiling.
- We limit the storage of personal data in accordance with the law to the time-frame necessary to fulfill the purposes for which it is collected, unless events occur which can extend the period.

- We protect your personal data against loss, unauthorized access, accidental loss or alteration and other unlawful forms of processing
- If personal data is made available to third parties, it is done in a secure manner, contractually secured and in accordance with the binding legal regulations.

IV. Users' rights regarding personal data processing

VERBA-TEXT shall exercise Users' personal data processing rights. These rights are derived from the applicable law provisions regarding personal data, in particular from the GDPR (Articles 16-21).

The user has the right to:

- **Withdraw consent** to process personal data at any time (see point VII below)
- **Right of access to data:** you have the right to receive confirmation from VERBA-TEXT as to whether your personal data is being processed by VERBA-TEXT and how it is being processed.
- **Right of rectify** outdated or inaccurate personal information, and the right to supplement them if they are incomplete.
- **Right to object to personal data processing**, if we process your personal data on the basis of our justified interest (e.g. analytical, evidential, archiving purposes), in the event of your objection, we shall cease to process your data unless we prove that there are substantial, legitimate grounds for processing which should objectively take precedence over your inconvenience or rely on the defense of our claims (e.g. in court proceedings). The right to object also applies where the processing concerns direct marketing, including profiling, based on our substantiated interest, e.g. in relation to profiling based on cookies. In such case, personal data processing for that purpose must be immediately stopped.
- **The right to delete personal data by VERBA-TEXT ("the right to be forgotten")** In principle, it consists in requesting the data controller to delete personal data without delay.
- **Right to limit personal data processing** In practical terms, this may involve temporarily blocking user access to your data or transferring the data to another system.
- **Right to transfer data** you have the right to receive a copy of the personal data that you have provided us with if the processing is based on your consent or on a contractual basis, as well as in an automated manner.
- **Right to lodge a complaint with a supervisory authority** Inspector General for the Protection of Personal Data (later to the President of the Office for Personal Data Protection).

You can file any requests regarding the processing of personal data, including your rights, to the following e-mail address: biuro@verba-text.pl or in writing to Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K Warsaw (02-793), street name: Belgradzka 4 apt. 13 with the indication "DPO". For a request for withdrawal of consent, see also Section VII below.

Your requests shall be met without undue delay, but no later than one month after receipt. This period may be extended by another two months due to the complexity of the request or the number of requests, of which we shall inform you. However, until your application is processed, you may receive information from us that you have opted out of by revoking your consent.

V. Personal data protection

VERBA-TEXT takes technical and organizational measures to protect personal data against unlawful or unauthorized access or use, as well as against accidental destruction, loss or violation of its integrity. Ensuring security was our guiding principle when designing IT infrastructure, standards and business practice. Our security procedures include in particular: access security, backup system, monitoring, review and maintenance, security incident management.

As part of ensuring the security of your personal data, we undertake to take the following into account:

- a) confidentiality - we will protect your data against accidental disclosure to third parties,
- b) integrity - we will protect your data against unauthorized modification,
- c) availability - we will provide access to your data to authorized persons, if necessary .

Your personal data may be processed by third parties only if they undertake to provide appropriate technical and organizational measures to ensure the security of personal data processing, as well as the confidentiality of such data. Each VERBA-TEXT employee who has access to personal data has an appropriate authorization and is obliged to maintain confidentiality.

VI. How do we process your data?

For what purpose and on what basis do we process User data?

VERBA-TEXT processes your personal data only for specified, explicit and legitimate purposes. We will not process your data in a way that is incompatible with these purposes.

VERBA-TEXT informs the User about the purpose and legal basis of the processing of personal data each time in a separate message, e.g. on a website, in writing, etc. as part of the implementation of the information obligation.

Method of data collection

Your personal data may come from a variety of sources on the basis of your consent, including, but not limited to, our websites, in the form of online shops, contact forms, forms, social media, and hotlines. Independently of that, in relation to the fact that you use VERBA-TEXT websites, we also collect data contained in system logs (more information can be found in point XII).

What data we are allowed to process?

The personal information we mean may include your identification information, such as your name, contact details, such as telephone number, email address, location information, information regarding your orders, complaints. Each time, we will define

and process only the necessary data. If you provide us with contact details, you only need to provide us with your telephone number and e-mail address.

As part of the operation of various websites, VERBA-TEXT may collect various personal data, submitted voluntarily, but often necessary in order to handle your order or inquiry. If you do not wish to provide information via the Internet, you can always contact us in person.

Users using our service (VERBA-TEXT pages) remain anonymous until they decide that they want to log in and/or voluntarily provide their personal data.

VII. Consent - withdrawal of consent

In relation with the User, also within the framework of services offered through the website, User may be asked to consent to the personal data processing for marketing purposes, including electronic marketing, if it is your consent that may constitute the appropriate legal basis for the processing of your personal data. VERBA-TEXT does not ask for consent in a situation when it is not necessary in a specific case (although the obligation to obtain consent may result from other legal regulations, e.g. consent for telephone or electronic marketing).

The user has the right to withdraw his/her consent at any time by direct contact with VERBA-TEXT.

Withdrawal of consent does not have any negative consequences - however, you must know that withdrawal of consent may result in the inability to use such services as receiving a newsletter, receiving promotional offers, invitations to events, etc., for the provision of which the law requires us to obtain your consent.

Please remember that withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of the consent prior to it being withdrawn.

Your request for withdrawal of consent will be handled promptly. Once we have met your request, we will no longer process your data for marketing purposes, including receiving marketing and sales information electronically and by telephone. However, until your application is processed, you may receive information from us that you have opted out of by revoking your consent.

If we have your data for other purposes (e.g. contract performance, services, evidence, claims), we may continue to process it for these purposes on a different legal basis.

VIII. Data storing

VERBA-TEXT stores personal data for the period necessary to carry out objectives about which the User has been informed.

The storage period for personal data is established in strict accordance with the applicable legal regulations. You have the right to be informed by us of the likely duration of the storage of your personal data.

IX. Sharing of data with third parties

With the User's consent, depending on the purpose of the data processing and the content of the consent for processing and making available, your personal data may be made available to the entities indicated in the consents.

We may share your data with processors - companies providing services on our behalf, to whom we outsource activities requiring data processing, in particular in the scope of IT services, marketing services (including marketing agencies), accountants, market research, event organization and execution, call center.

With regard to the marketing purpose, the recipients of your personal data as a processor may be VERBA-TEXT partners, acting on behalf of VERBA-TEXT.

We point out that in the event when data recipients collect personal data from the User independently and on their own behalf, and, for instance, offer products and services via their own channels, they act as separate data controllers, and in this respect, they bear their own responsibility for the processing of such personal data, without being subject to the terms of our Policy.

X. Cookies

When you use VERBA-TEXT websites, we also collect data contained in system logs. VERBA-TEXT uses them primarily for technical purposes related to administration of our servers.

In addition, VERBA-TEXT uses this information for the purposes of collecting demographic statistical information. The statistics we keep allow us, first of all, to analyze the use of the functionalities provided by the VERBA-TEXT websites. System logs collect information about IP addresses (network interface number), however, the data do not allow us to identify the user unambiguously (indication of a specific natural person using a computer or other device connected to the Internet).

Cookies

Cookies are small text files sent by the portal and stored on the User's computer (or other device he/she uses). We do not use cookies to collect personal information such as your name or email address.

The Portal uses cookies in order to recognize User's personal preferences. In other words, the cookie files used by the website allow to identify the User's computer during the next visit to the portal and are intended only to facilitate the use of the portal.

Profiling

As part of the processing of your personal data, we may perform profiling:

- a) based on the User's consent - in order to select offers of products and services according to the needs of a given User (including the use of automated processes, consisting in compiling your data within the scope of granted consent, coming from various sources (including data collected by VERBA-TEXT or websites) and assigned on this basis a profile, the consequence of which is to adjust and present to you advertisements or offers corresponding to your profile;
- b) without consent, on the basis of our legitimate interest within the scope of processed

cookies, in order to adjust the content and marketing messages displayed on VERBA-TEXT pages and on other pages visited by you to your preferences and interests, on the basis of such data as: visits to the pages and clicks within the framework of particular functionalities of VERBA-TEXT pages, dates of logging in and registration, usage statistics for individual services on the VERBA-TEXT website.

Banner ads

We use the data collected during the User's visit to our websites in order to display the so-called banner advertisements. This advertisement is usually made using cookies or pixels. Our goal is to develop an advertising offer that will be attractive and beneficial for the User, therefore, as part of banner advertising, the User may see first of all products that he has already seen on our website or products similar to those previously seen by him on other websites (so-called retargeting). As part of banner advertising, we do not use personal data which would directly indicate a specific User.

XI. Policy changes

Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K., reserves the right to introduce changes in this policy, which may result from the need to adapt to changes in law or applicable privacy standards, or to expand our offer. Therefore, Verba-Text Spółka z ograniczoną odpowiedzialnością Sp.K. shall inform about any changes in its website by means of a relevant announcement.

XII. Copyrights

All rights to the Service www.verba-text.pl including all its elements in the graphic, photos and layout of the pages of the Website as well as other elements are reserved. The Service and all its elements are protected by law, in particular by the Act of 4 February 1994 on Copyright and Related Rights (consolidated text in Journal of Laws of 2017, item 880, as amended), the Act of 16 April 1993 on Combating Unfair Competition (consolidated text in Journal of Laws of 2018, item 419) and the Act of 27 July 2001 on the protection of databases (Journal of Laws of 2001 No. 128, item 1402, as amended).

XIII. Price lists

Price lists and other information contained on the websites www.verba-text.pl do not constitute a commercial offer. Due to emerging promotional campaigns and/or expected time of service, changes to the prices presented on the pages and in the price lists are possible.