



SUNCODE

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SUNCODE Spółka z ograniczoną odpowiedzialnością

30 Józefa Kraszewskiego Street, 60-519 Poznań

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Privacy Policy

I. Introduction

Personal data protection and information security have always been a top priority in the activities of SUNCODE Sp. z o.o. based in Poznań. As a responsible organization, that is aware that information has a certain value and is a resource that requires proper protection, we are committed to duly informing you about matters related to the processing of personal data, especially given the content of the new regulations on data protection of personal data, including the Regulation of the European Parliament and the Council (EU) 2016/679 of 27.04.2016 on the protection of natural people about the processing of personal data and the free flow of such data and the repeal of Directive 95/46/WE ("GDPR"). Therefore, in this document we present key information about the legal basis for processing personal data, the ways in which it is collected and used, as well as about the rights of data subjects in connection therewith.

II. When is this Privacy Policy applicable?

This privacy policy applies to all cases in which the company SUNCODE is a data controller and processes personal data. It applies to both cases in which we process personal data obtained directly from the data subject, and cases in which we have obtained personal data from other sources. The SUNCODE Company carries out its information obligations in both of the above cases, set forth in Article 13 and Article 14 of the GDPR, respectively, in accordance with these provisions. Please find below the full details of the company:

SUNCODE Sp. z o.o. based in Poznań (60-519) at 30 Józefa Kraszewskiego St. (National Business Registry Number: 380452880, TAX ID Number: 7792491387, Court Register Number: 0001005513)

III. Contact point

The person who will respond to your inquiries regarding the processing of personal data is Data Protection Officer. You can contact him/her at. e-mail: rodo@suncode.pl at phone number: 61





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8200-449 or meet in person at the headquarters of Our Company.

IV. Scope, methods, purposes, legal basis and periods of processing Data

To be transparent about the ways and legal basis for processing of personal data, the purposes for which we process such data, as well as the periods of processing, below we present a summary of the operations under which we process personal data.

At the same time, we would like to assure you that whenever we process personal data based on a legitimate interest of the data controller, we try to analyze and balance our interest and the potential impact on the data subject (positive and negative), and the rights of that person. We do not process personal data when we come to conclude that the impact on the data subject would outweigh our interests, unless we have another legitimizing premise, e.g., we have the appropriate consent, or we are required or permitted to do so by law.

V.1 Processing of personal data of visitors to websites maintained by SUNCODE or using services provided electronically

1. General information

Individuals who visit our websites or use the services provide by us electronically, have control over the personal information they provide to us, while we ensure that the collection and use of information about users are limited to the minimum required to provide them with the services at the expected level.

2. Online applications and forms

Our website offers you various ways to get in touch with us. We assure you that this data is processed only within the framework and for the purpose for which it was provided and with your express consent. The legal basis for processing in this case is your consent given by sending an inquiry via email (Article 6 (1)(a) GDPR).

3. Newsletter

The Company may process data because you have consented to the processing of your personal data for the purposes of subscribing to the newsletter (Article 6(1)(a) of the GDPR). Your personal data will be processed at most until you revoke your previously expressed consent. This can be done by contacting us at: rodo@suncode.pl.





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IV.2 Processing of personal data of people contacting SUNCODE

For the purpose of obtaining information about an offer or sharing comments on services, as well as contacting to conclude a contract from individuals who contact us for the purpose of obtaining information about an offer or sharing comments about our services, as well as those contacting to conclude a contract, we collect the following personal data: first name and last name, email address and telephone number. In particular, these individuals may email us through the website. Such messages may contain additional information the user wishes to include in the message.

We request that you do not provide, via the websites, information containing special categories of personal data, as listed in

Article 9(1) of the GDPR (information about race or ethnicity, political views, religious or philosophical beliefs, trade union membership, information on physical or mental health, genetic data, biometric data, information about sex life or sexual orientation, and criminal history). If you provide such information for any reason, it will imply your express consent to our collection and use of such information as specified herein or as specified in the place where such information is disclosed.

4. Login files

Each time a web page is accessed, our system automatically collects data and information from the computer system of the computer that is opening the page. What follows is collection of the following data:

- 1) information about the type of browser and the used version,
- 2) the user's operating system,
- 3) the user's IP address,
- 4) the date and time the page was accessed,
- 5) websites from which the user's system went to our website (the so-called referrer),
- 6) websites accessed by the user's system through our website.

The data is also saved in the login files of our system. Saving the data together with other personal data of the user does not take place. Based on this data, it is not possible to identify a person, since the IP address is only available in masked form. The transferred data is also





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retained and processed for error analysis and for statistical purposes in a log file.

Temporary storage of the IP address by the system is necessary to enable making the site available to the user's computer. For this purpose, the user's IP address must be saved for the duration of the session. The saving of the login files is intended to ensure the functionality of the website. In addition, we use the data to optimize the website and to ensure the security of our IT systems. Data analysis for marketing purposes does not take place in this connection.

5. Cookies

To a limited extent, we may collect personal data automatically via cookies found on our websites. Cookies are small files of computer data, saved and stored on your computer, tablet, or smartphone intended for use on websites. 'Cookies' usually contain the name of the site from which they come, the time they are stored on the device, and a unique number.

Cookies are used for the following purposes:

- adapting websites to user's preferences and optimizing use of the of websites;
- personalizing the content displayed for a given website user; - creating statistics, explaining the ways of using websites by users which makes it possible to improve their design and content of the website [so-called content];
- maintaining a user session (after logging in), allowing to skip logging in on each subpage of the website;
- optimizing advertising and marketing offers for a given website user
- three main types of cookies are used: "session", "permanent" and "external".

"Session" cookies are temporary files that are stored on a computer, tablet, or user's smartphone until the user logs out, leaves the website, or closes the browser, and are used to support services that require authentication within the given website.

"Permanent" cookies are stored on your computer, tablet, or smartphone for the time specified in the parameters of the cookies or until they are deleted by the user, and are used to remember the user's selected settings and personalize the interface.

"External" cookies (so-called third-party cookies) enable the collection of information about how the websites are used and provide users with advertising content, optimally tailored to the interests of individual users.

Personal data collected by using cookies are encrypted to prevent access to them to unwanted and unauthorized individuals. They are collected for only the purpose of performing for the





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user's benefit for specific functions.

SUNCODE informs you that most web browsers include settings that allow you to accept cookies by default. If you do not agree to monitoring of your activity on the website, you can at any time disable cookies in your browser. In addition, you have the right and the possibility to make such settings in your Internet browser regarding cookies, which will automatically block their handling.

The use of our website without the use of cookies is possible, however, in individual situations, this may cause certain limitations in the functionality of the website.

Detailed information about the possibility and methods of handling cookies is available in the settings of your software, i.e., your web browser.

- Firefox browser
- Chrome browser
- Internet Explorer browser
- Opera browser
- Safari Browser

To analyze user behavior, we use Google Analytics, a web analytics service of Google Inc. (hereinafter referred to as 'Google'). However, we have contracted Google to anonymize your IP address before analyzing your online behavior. We have made the appropriate entries in the Google Analytics software code.

Google Analytics uses cookies, which are stored on your computer and enable analysis of how you use the website. Cookies used by Google Analytics may be temporary or permanent files, whose maximum validity generally does not exceed two years. Information produced by cookies regarding your use of the website is generally transferred to a Google server in the USA and stored there.

Due to the IP anonymization activated by us, your IP address is shortened within the Member States of the European Union or in other countries that are party to the Agreement on the European Economic Area before being transmitted to a Google server in the United States. Only in exceptional cases beyond our control is the full IP address transmitted to a Google server in the USA and is shortened there. As part of our order Google will use the above information to evaluate the use of our website, to create reports on website activity, and to provide us other services related to the use of the website and the Internet. IP address transmitted by your browser within the scope of Google Analytics is not combined with other Google data.





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IV.3 Processing of personal data of customers and potential customers

SUNCODE SP. Z O.O. may process the data because:

- they are necessary for the execution of the contract concluded with you or to take action to its conclusion based on your interest in our offer. One of its elements is also to obtain opinions about the quality of our services and products and the level of satisfaction of our customers, which we do by contacting you directly after the service / delivery of the product (Article 6(1)(b) GDPR),
- are necessary to comply with legal obligations incumbent on the controller (Art. 6(1)(c) GDPR),
- processing is necessary for purposes arising from the legitimate interests of the administrator (Article 6(1)(f) GDPR), i.e., for the purpose of asserting possible claims (of either party), for analytical purposes, for the purpose of systematically surveying customer satisfaction and determine the quality of our products, for the purposes of direct marketing,
- you have given your consent to the processing of your personal data (Article 6(1)(a) of the GDPR).

In addition, the law, in some cases, requires the Company to process data for tax and accounting purposes.

The period of processing of the data in question depends on the purpose of the processing indicated above:

- a) Your data obtained for the purpose of concluding a contract that was not in effect concluded we keep for the period of negotiation of the contract and until the end of the calendar year following the year in which you last contacted us for the purpose of its processing,
- b) in the case of a conclusion of a contract, the period of data processing is limited to the time, during which it is possible to make potential claims,
- c) where processing is based on consent, your personal data will be processed at most until it is revoked,
- d) processing of personal data on the basis of the legitimate interests of the administrator is possible until an objection is raised, taking into account the overriding interests, rights and freedoms of the freedoms of data subjects and the Administrator.





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IV.4 Processing of data of job candidates at SUNCODE Sp. z o.o.

Your data is collected for the purposes of the current recruitment and for taking action before conclusion of a contract (Article 6(1)(b) GDPR). The Company may also process your personal data also for future recruitment, if you have given your separate consent to their processing (Article 6(1)(a) GDPR).

Your data will be processed by us during the recruitment process, and where processing is based on consent to participate in future recruitment proceedings, your personal data will be processed until the consent is revoked, for a maximum period of 12 months.

V. Recipients of data

We transfer your personal data to other entities based on the requirements of the law or in connection with the fulfillment of the purpose for which they were provided to us. At the same time, we declare that we only use the services of entities that are proven, known on the local market and providing guarantees for the security of your data. The contracts under which we entrust the processing of personal data, contain provisions on the protection measures required by us to ensure the confidentiality, integrity, and availability of the transferred data.

We may transfer your personal data to companies or other trustworthy business partners who provide services on our behalf, for example to provide technical support, to assess the suitability of the website for marketing purposes or other provision of the website. In addition, your data may be transferred to providers of such services as debt collection, tax, legal, accounting services. Your personal data is transferred to these entities and other third parties only if it is necessary to perform the services you have requested or authorized, to protect your and our rights, property or security, or if we are required to do so under applicable laws, court rules or regulations of other authorities, or if disclosure of personal information is otherwise necessary to support legal or criminal findings or litigation.

In addition, access to your personal data will be granted to authorized employees of the company.

VI. Rights related to the processing of personal data

Individuals have certain rights regarding their personal data, and SUNCODE Sp. z o.o. as the data administrator is responsible for exercising these rights in accordance with



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applicable laws and regulations. For any questions or requests regarding the scope and exercise of your rights, as well as to contact us precisely to exercise a of a particular data protection right, please contact the person designated by us in Section III. We reserve the right to exercise the following rights upon positive verification of the identity of the person requesting to perform the activity.

You have the following rights related to the processing of personal data:

1. the right to revoke consent to data processing, at any time without affecting the legality of the processing that was carried out on the basis of said consent prior to its revocation, if we process your personal data on the basis of consent,
2. the right to access your personal data,
3. the right to request rectification of your personal data,
4. the right to request deletion of your personal data,
5. the right to request restriction of processing of your personal data,
6. the right to object to processing at any time, including object to the processing of your data for the purpose of direct marketing, and if we process your personal data based on a legitimate purpose, you have the right to object on grounds related to your particular situation. If you exercise this right, we will cease processing your data for that purpose, unless we demonstrate the existence of valid legitimate grounds for processing, overriding your interests, rights and freedoms or grounds for establishing, asserting or defending claims.
7. the right to transfer your personal data, i.e., the right to receive from us your personal data, in a structured, commonly used computer format suitable for machine reading. You may send this data to another administrator or request that we send it to another administrator on your behalf. However, we will only do this if such transmission is technically possible. The right to portability of personal data applies only to those data that we process under contract or on the basis of your consent;
8. The right to lodge a complaint to the supervisory authority in charge of data protection i.e., the President of the Office for Personal Data Protection.

VII. Changes in this Privacy Policy

We undertake to regularly review this Privacy Policy and amend it when it becomes necessary or desirable due to: new laws, new guidelines of the authorities responsible for supervising personal data protection processes, best practices in the area of





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personal data protection. We also reserve the possibility of changing this Privacy Policy in the event of changes in the technology with the use of which we process personal data (to the extent that the change affects the wording of the this document), as well as if there is a change in the methods, purposes or legal basis for of our processing of personal data.

