

PRIVACY POLICY / INFORMATION CLAUSE OF THE DATA CONTROLLER

DATA CONTROLLER:

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 – the General Data Protection Regulation, known as GDPR (Official Journal of the EU L. of 2016 No. 119, p. 1) and the Act of 10 May 2018 on the protection of personal data (Journal of Laws of 2018, item 1000), we inform you that the legality of processing is filled by the conditions specified in Art. 6(1)(b) of the GDPR (necessary for the performance of a contract) and Art. 6(1)(c) of the GDPR (legal obligation incumbent on the controller), and that: Your personal data controller is Pixel Technology Ltd. with its registered office in Lodz, Piękna 1 Street, postal code 93-558, e-mail: biuro@pixel.com.pl, phone: +48 42 637 39 73, fax: +48 42 637 56 84, website: www.pixel.com.pl The Controller has appointed a Data Protection Officer supervising the correctness of personal data processing, who can be contacted via e-mail: iod@pixel.com.pl;

What personal data is processed:

The range of personal data processed by us largely depends on the data you provide to us - providing personal data is voluntary. Usually, this is the name and surname, sometimes the position in the given company, email address, telephone number. Therefore, it is always worth considering whether all personal data provided to us (e.g., in response to an email) are necessary for contact, or some are unnecessary

If you want to sign up for the newsletter, you need to provide us with your e-mail address and first name via the newsletter sign-up form.

In addition, through cookies (see further), we process data on internet behaviors and preferences. For this purpose, we use the IP address of the mobile device or computer, the pages you visit, the URL of the request, the domain name, the device identifier, and other similar information.

We also use information about you to tailor the most suitable offer of our products or services. Sometimes we ask for your opinion about our products in order to improve our offer.

What we do with personal data:

Processing we understand as everything we can do with such data, e.g., collecting, recording, storing, transmitting, viewing, analyzing, etc.

Who has access to personal data:

recipients of your personal data are authorized employees of the Controller, possible entities processing data on behalf of the Controller, and entities authorized to obtain personal data on the basis of legal provisions;

Purposes of data processing:

Your personal data may be processed for the purpose of:

- conclusion and execution of the contract – fulfilling obligations resulting from legal provisions, e.g., tax law, accounting regulations, – adapting the content of websites to preferences and interests – marketing, including profiling. Your data is needed to personalize the offer sent by electronic or traditional mail, presented on our website, and in our mobile applications. We do this based on consent, but you can always opt-out of such marketing, including profiling related to such activities analysis. We analyze the results of our marketing activities to measure their effectiveness and the accuracy of our campaigns. For this purpose, we carry out statistical activities to continuously improve our services. – detecting bots and abuses – providing services electronically

Legal bases for data processing

The legal basis for processing personal data will vary depending on the purpose of processing:

Personal data processed for the conclusion and execution of a contract are processed based on Art. 6(1)(b) of the GDPR (necessary for the performance of a contract to which the data subject is a party).

After concluding the contract, they are also processed based on Art. 6(1)(c) of the GDPR (e.g., data from invoices) and for archival and statistical purposes (Art. 6(1)(f) of the GDPR). In this last case, they are already pseudonymized data.

Personal data provided to us for the purpose of contacting you are processed based on Art. 6(1)(a) of the GDPR, i.e., your consent resulting from initiating contact. The legal basis for processing after the end of the contact is a legitimate purpose in the form of archiving correspondence for the purpose of demonstrating its course in the future (Art. 6(1)(f) of the GDPR).

Personal data provided to us during the newsletter sign-up process are processed based on Art. 6(1)(a) of the GDPR – consent is expressed during the newsletter sign-up.

Personal data processed for the purpose of adjusting the content of websites, services, applications, and other functionalities

How long will your personal data be stored?

The period for which personal data is processed depends on the purpose for which it is processed.

If you have provided your personal data for correspondence purposes (e.g., email exchanges), they will be archived for a period of 6 years.

If you have provided us with your personal data for the purpose of entering into a contract, they are processed for the duration of the contract, including warranty obligations, warranty, and service (if applicable), and for the period after its completion resulting from tax and accounting regulations and the principles of limitation of civil law claims.

If you have provided us with personal data while signing up for a newsletter, they will be processed for the duration of the newsletter's operation unless you object or request their removal sooner.

If you have provided us with personal data for marketing purposes, such data will be processed until you withdraw your consent for such processing.

If you have provided us with personal data, they are processed to tailor website content to your interests, as well as to detect bots and abuse and to carry out statistical measurements and service improvements, personal data will be processed for these purposes until you object or until you stop using our services.

Requirement to provide personal data

Providing personal data is voluntary, but necessary to sign up for the newsletter and to maintain contact.

Providing personal data for the purpose of entering into a contract is necessary for its conclusion.

Providing personal data for marketing purposes, including profiling, as well as for analytical purposes is voluntary.

What are your rights related to the processing of personal data?

- the right to access your data, including obtaining one copy of the data,
- the right to request the rectification and supplementation of data,
- the right to delete data - the right to be forgotten (in specific situations),
- the right to lodge a complaint with the supervisory authority responsible for personal data protection,

the right to restrict data processing (e.g., suspending operations on data for some time), excluding cases indicated in Article 18(2) of GDPR, e.g., this right will not be applicable to the extent that processing personal data is necessary for asserting potential claims.

- If your personal data is processed based on consent, you can additionally exercise the following rights:
- the right to withdraw consent in the scope in which they are processed on this basis. - Withdrawing consent does not affect the legality of processing that was carried out based on consent before its withdrawal.

the right to the portability of personal data, i.e., to receive your personal data from the administrator in a structured, commonly used format suitable for machine reading, or the right to request that personal data be transferred by the administrator directly to another administrator,

the right to object to automated decision-making in individual cases (including profiling) Article 22 of GDPR,

you may also object to receiving personalized commercial messages from us.

- However, if you have entered into a contract with us, you are not entitled to:
- the right to the portability of personal data (due to the lack of conditions specified in Article 20 of GDPR),
- the right to object to the processing of personal data (since the legal basis for processing your personal data is Article 6(1)(b) and (c)), and

the right to delete personal data is limited only to those data that are not necessary for the purposes indicated in Article 17(3)(b), (d), and (e) of GDPR, i.e., to fulfill a legal obligation requiring data processing, to establish, pursue and defend claims and for archival purposes.

- Then the following rights related to the processing of your personal data are available to you:
- the right to access the contents of your personal data (Article 15 of GDPR),

the right to rectify them (Article 16 of GDPR),

- to complete them (Article 16 of GDPR),

the right to restrict their processing (with some exceptions)

- More information about your rights is contained in the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 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).

To exercise the above rights, we provide the following communication channels:

written form - address: ul. Piękna 1, 93-558 Łódź

email form - email: biuro@pixel.com.pl

Data Recipients

Your personal data may also be processed by our subcontractors, i.e., entities whose services we use in connection with providing services for you.

Your personal data is disclosed to:

- authorized employees and persons cooperating in the execution of the contract,
- entities providing IT services,
- public authorities – upon their request.

In the event that you enter into a contract with us, your personal data may also be disclosed to:

- entities providing additional services for us – tax auditors, statutory auditors examining the financial statement,
- entities supporting electronic payment services,
- couriers and parcel delivery companies.

In case you provide us with your personal data for marketing purposes, we may pass it to marketing agencies and research companies.

Your personal data is always processed on the instructions of their administrator, i.e., us.

We make every effort to ensure that third parties have access only to those personal data that are necessary to perform specific tasks.

Our institution has implemented appropriate security policies and standards to protect your personal data. We have implemented, among others, the ISO 27001 procedure to better protect your personal data. These procedures are regularly updated to remain compliant with legal regulations and technological changes. We also apply appropriate technical and organizational measures (including IT security measures) to ensure the confidentiality and integrity of your personal data. Our employees and cooperating entities are obliged to maintain confidentiality and may not disclose your personal data unlawfully or unnecessarily.

If you want to learn more about our procedures regarding the protection of personal data, as well as how your data is used, you can contact us via: email biuro@pixel.com.pl, by phone at +48 42 637 39 73, fax +48 42 637 56 84, or at the headquarters in Łódź, ul. Piękna 1, postal code 93-558.

Transfer of Data Outside the European Economic Area

Your personal data may be transferred outside the European Economic Area.

All entities to whom we entrust the processing of personal data guarantee the application of appropriate personal data protection and security measures required by law.

For example, due to the use of Google services, your data may be transferred to the United States of America (USA) in connection with their storage on American servers. Google has joined the EU-US Privacy Shield program to ensure an adequate level of personal data protection required by European regulations.

Right to Lodge a Complaint

You have the right to lodge a complaint with the President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, tel. +48 22 531 03 00, if you believe that the processing of your personal data violates the provisions of the GDPR.

Cookies and Other Technologies

Our website, like almost all others, uses cookies.

Cookies are small text information stored on your end device (e.g., computer, tablet, smartphone) that can be read by our teleinformatics system (own cookies) or the

teleinformatics system of third parties (third-party cookies). Cookies are encrypted in such a way that unauthorized persons do not have access to them.

Some cookies used by us are deleted after the end of the internet browser session, i.e., after its closure (session cookies). Other cookies are stored on your end device and allow us to recognize your browser the next time you visit the site (persistent cookies).

We use cookies to:

- maintain the session from the moment of logging in to the portal,
- display the website correctly to adjust it to the device you are using,
- adjust our website to your preferences, e.g., the choice of language in which it will be displayed.
- measure the effectiveness of our marketing activities,
- improve the functioning of our website,
- detect abuses, such as artificial internet traffic (e.g., bots),
- carry out marketing activities. For this purpose, we profile ads displayed on web pages according to your preferences in terms of product selection.

As you can see from the above list, some cookies are technical and necessary for the proper use of our website.

If you consent to marketing cookies, then we can use information about your behavior on websites to tailor advertisements.

You can always stop us from processing this information in the form of cookies. Just delete the cookies from the device you are using, e.g., a computer, smartphone, or tablet. Upon re-entering the website, you will be asked again to make a decision regarding consent to marketing cookies (each time you will have the opportunity to make a free decision).

If you want to delete cookies or withdraw consent for their installation in your internet browser, you must do this from within your browser.

Marketing cookies will be valid for a maximum period of 90 days from the date of their installation.

Remember: You can always refuse to use cookies for marketing purposes.

However, you must be aware that disabling or restricting the use of cookies may cause difficulties in using our website, as well as many other websites that use cookies.

You should know that in order to understand your needs, we use the help of our partners, including:

- we use Google LLC's cookies for the Google Analytics service.
- we also use social media portals in such a way that we present our offer there, among other things. For this purpose, we use cookies from the administrators of social networking services such as Facebook, Twitter, Instagram, YouTube, Google+ and others.
- we use tools that enable us to target personalized advertisements.

we post videos and materials about our services on portals designed for this, e.g., YouTube.

- If you are interested in the details related to the processing of personal data by the entities we cooperate with, you can familiarize yourself with the procedures they have implemented on their websites. To facilitate this, we provide you with links to some of our partners:

Google Analytics: <https://support.google.com/analytics/answer/6004245>.

Facebook: <https://www.facebook.com/privacy/explanation>.

HotJar: <https://www.hotjar.com/legal/policies/privacy>.

GetResponse:

<https://www.getresponse.pl/email-marketing/Informacje-prawne/polityka-prywatnosci.html>.

Please note that the links provided are for reference purposes and would need to be accessed through a web browser.