

## PRIVACY AND COOKIES POLICY

Fulfilling the obligations arising from the content of Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter referred to as GDPR), we present the most important information related to the processing of personal data in connection with the use of the MuoTec Platform via <https://muotec.com> or <https://app.muotec.com> (hereinafter referred to as the **Website**)

### 1. Personal data administrator

The administrator of the personal data processed within the Website is ShowIT spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, address: ul. Chmielna 2/31, 00-020 Warsaw, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw XII Economic Department of the National Court Register under the KRS number 0000619659, having NIP 5252660483 and Regon 364510176, e-mail address: [kontakt@showit.pl](mailto:kontakt@showit.pl), telephone number: +48 729 981 212 (hereinafter: **Administrator** or **ShowIT**).

### 2. Contact

In all matters related to the processing of personal data, it is possible to contact us:

- electronically via e-mail address: [privacy@showit.pl](mailto:privacy@showit.pl);
- in the form of traditional correspondence sent to our address indicated in point 1 of the Privacy Policy.

### 3. What and whose personal data do we process?

In connection with the use of the Site, we may process the following personal data:

- 1) personal data - name, surname, company for which the Site User acts;
- 2) contact data - telephone number, e-mail address;
- 3) data necessary for the conclusion and performance of the contract for the provision of services on the MuoTec Platform;
- 4) device information, connection information or information about activity on the Site (including identification and location data);
- 5) data that is submitted in the contact form.

We would also like to inform you that we do not process specific personal data within the Website.

In connection with the use of the Website, the data of its **Users** may be processed:

- 1) persons using the service within the MuoTec Platform;
- 2) persons using the Newsletter services;
- 3) persons contacting the Administrator via the contact form;
- 4) persons visiting the Site for purposes other than those indicated above.

We indicate that we do not knowingly collect data from persons under the age of 13.

#### 4. Method of data collection

Data is collected:

1. directly from Users through contact carried out via the Website or means of remote communication;
2. through technologies that enable automated online tracking (cookies, web tags).

#### 5. Purposes, grounds and duration of personal data processing

We process personal data for the following purposes, on the following grounds and for the following duration:

**PURPOSE: To conclude and execute a SaaS service agreement for the MuoTec Platform**

**Legal basis:**

- 1) to take necessary actions at the request of the User to conclude the Agreement and to perform the concluded Agreement (Article 6(1)(b) GDPR);
- 2) in order to fulfill legal obligations incumbent on the Operator on the basis of Article 6(1)(c) GDPR, arising in particular from tax regulations;
- 3) on the basis of legitimate interests pursued by the Operator on the basis of Article 6(1)(f) of the GDPR, which the Operator considers in particular: investigation, establishment and defense against claims.

**Duration of personal data processing:**

- 1) the duration of the contract and the period of the statute of limitations for claims arising therefrom, no longer than until the Operator reports an effective objection to the processing of personal data;
- 2) the duration of legal obligations, in particular the storage of tax records related to the execution of the contract

**PURPOSE: to respond to a contact via the contact form**

**Legal basis:** legitimate interest, which is: to provide explanations in accordance with the User's inquiry and to promote our own activities and our own products (Article 6(1)(f) GDPR)

**Duration of personal data processing:** the time needed to respond to the issues indicated in the inquiry and the period of storage of correspondence, no longer than until a report is made to effectively object to the processing of personal data.

**PURPOSE: Newsletter****Legal basis:**

- 1) the necessity of processing for the conclusion and execution of the contract for the provision of the Newsletter (Article 6(1)(b) GDPR);
- 2) Legitimate interest of promoting its own goods and services, as well as asserting and defending against claims arising from the delivery of the Newsletter (Article 6(1)(f) GDPR).

**Duration of personal data processing:** the duration of the contract for the delivery of the newsletter, and after its expiration, only for the period necessary for the fulfillment of the designated purposes, no later than until the statute of limitations for claims under separate laws or a report of an effective objection to data processing.

**PURPOSE: marketing and analytical activities consisting of optimizing the functioning of the website, profiling, analyzing website traffic using cookies and similar technologies**

**Legal basis:** our legitimate interest in analyzing Website traffic, improving the quality of our services, promoting our own goods and services (Article 6(1)(f) of the GDPR) and the consent granted by you for the use of cookies (Article 6(1)(a) of the GDPR).

**Duration of personal data processing:** the duration of marketing activities in this regard, not longer than until you effectively object or revoke your consent.

## 6. Cookie policy and use of similar technology

The website uses cookie technology. These tools process anonymized personal data (they do not enable us to identify ourselves and are not intended to do so), but due to doubts about their legal status, they may be considered personal data.

### What are cookies?

Cookies are small text files installed on the device of a user browsing the Site. Cookies collect information that facilitates the use of the Website - for example, by remembering the user's visits to the Website and the actions he/she performs, such as selecting the language version of the Website.

We use cookies on the basis of consent (Article 6(1)(a) of the GDPR), except when cookies are necessary for the proper functioning of the site.

Some of these cookies come directly from the Site and are used upon re-entry (first-party cookies, our own), while others come from other entities whose services we use (third-party cookies, external). Third-party services are described below.

In terms of optional cookies, their use is subject to consent to a particular group of cookies - the groups were created by reference to the purposes of the cookies. Cookies can be distinguished:

1. **Functional** - to help perform certain functions, such as sharing site content on social media platforms, collecting feedback and other third-party functions.
2. **Performance** - used to understand and analyze the site's key performance indicators, which helps ensure that the site performs better for the user.
3. **Analytical** - used to understand how visitors interact with the website. These cookies help provide information about visitor metrics, rejection rates, source of traffic, etc.
4. **Essential** - are absolutely necessary for the proper functioning of the website. These cookies ensure the anonymous operation of the site's basic functions and security features and do not require your consent to use them.

Consent for the use of cookies is given within the cookie settings panel within the Site. Consent can be given for the use of all cookies, some of them, or none. The choice in this regard can be changed at any time, and it is possible to delete cookies from the memory of your browser or device at any time.

Data processed using the above cookies are processed for a period of 1 year.

## 7. Voluntary provision of data

All data we process is provided voluntarily. However, failure to provide data may mean that it is not possible to achieve certain results directly related to the purposes of data processing (e.g., responding to a contact, providing information, delivering the Newsletter).

## 8. Recipients of data

Personal data may be disclosed and transferred to external entities that act on our behalf or for our benefit, including, in particular, cloud service providers, providers responsible for technical support of IT systems including handling the mailing of the Newsletter, entities providing legal, accounting, training, maintenance, postal or analytical and consulting services. With these entities we are bound by a contract of entrustment for the processing of personal data. For this reason, **we require them to maintain the confidentiality and security of information and verify that they provide adequate measures to protect personal data.**

Based on your consent to the use of marketing cookies, your data may be transferred to entities that provide us with relevant tools.

## 9. Automated decision-making and profiling

Please be advised that we use profiling for marketing purposes. However, we do not make any automated decisions (i.e., made without human involvement) with respect to Users that would have a legal impact or materially affect Users.

## 10. User rights

In connection with the processing of personal data, Users are entitled to:

- 1) The right to **access their data** and receive a **copy of it**;
- 2) The right to **rectify** (amend) their data;
- 3) The right to **delete their data**;
- 4) The right to request **restriction of data processing**
- 5) Right to data **portability** - insofar as the legal basis for data processing is consent or contract, i.e. Article 6(1)(a) or (b) of the GDPR;
- 6) The right to **withdraw consent to the processing of personal data** - at any time you can withdraw your consent to the processing of those personal data that are processed on that basis.

Remaining rights:

- 7) The right to **object to the processing** of data on the basis of **legitimate interests, for purposes other than direct marketing**. In such a situation, it is necessary to indicate the specific, particular situation that justifies the cessation of processing of the objected data. We will stop processing personal data for these purposes unless we demonstrate that the grounds for our processing of your personal data override your rights, or that your data are necessary for the establishment, investigation or defense of claims.
- 8) The right to **object** to processing on the basis of **legitimate interests, for direct marketing purposes**
- 9) The right to **lodge a complaint to the supervisory authority** - the President of the Office for Personal Data Protection or other competent supervisory authority

## 11. transfer of data outside the EEA

Our processing of personal data takes place primarily in countries in the European Economic Area (EEA), but, for example, in connection with the analytical and marketing tools we use (including cookies), it is possible that data may be transferred outside the EEA. To the extent that we have the ability to do so, we verify that the entities to which we directly share data provide guarantees of a high degree of personal data protection. These guarantees result, in particular, from a decision of the European Commission finding an adequate level of data protection in a given country, or from the obligation to apply standard contractual clauses adopted by the Commission (EU) pursuant to the provisions of Article 46(2) of the GDPR.