

Privacy Policy Website www.promisebaltic.com

General information

By using the services of www.promisebaltic.com ("Website"), provided by A.P.N. Promise S.A. with its registered office in Warsaw ("APN Promise"), you can provide APN Promise your identity data.

APN Promise and the APN Promise Group, which includes affiliates and subsidiaries of APN Promise respects the right to the privacy of the users of their services ("Users"), in particular, ensures the protection of their personal data and applies appropriate technological and legislative solutions preventing interference with Users' privacy by the third party.

All APN Promise's activities related to the collection and processing of all data are aimed at guaranteeing the User a sense of complete security at a level appropriate to applicable law, including 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 - GDPR).

Please be advised that the Website may also include external links enabling direct access to other websites or when using the Website, cookies may be additionally placed on the User's end device in order to allow the User to use the functionality of websites integrated with the Website (e.g. Facebook, LinkedIn, YouTube). Each of the suppliers specifies the rules for the use of cookies in their privacy policy, therefore we have no influence on the privacy policy of the providers and their use of cookies.

For security reasons, we recommend that before You use the resources offered by other websites, read the document regarding the privacy and cookies policy, if they have been made available, or in the absence of them contacted by the administrator of the site or service in order to obtain information in this subject.

This privacy policy will tell you:

- why we are processing your information
- what purpose we are processing it for
- whether you have to provide it to us
- how long we store it for
- whether there are other recipients of your personal information
- what rights You have

Controller

The controller of Your personal data is:

A.P.N. Promise S.A. (Domaniewska 44A Street, 02-672 Warsaw), entered into the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register, under number 0000375933, Tax Identification Number: 5210088682, REGON: 012521511, share capital PLN 1 015 358,00 (paid up in full).

As part of particular services of the Website, it happens that the information about you is also passed to partners – third parties with whom APN Promise cooperates directly or indirectly ("Partners"), primarily in order to provide you with services at the highest level.

In view of the above, the data controllers of the User may be the APN Promise Partners as part of the User's use of their services through the Website.

Personal data protection contact

In order to ensure the security of data collected by us and the necessity of constant monitoring of their processing, we have appointed a person responsible for the protection of personal data.

You can contact the appointed person in all matters regarding data processing and in order to execute your rights to the processing.

Address: A.P.N. Promise S.A., personal data protection
Domaniewska 44A Street, 02-672 Warsaw
E-mail: iodo@promise.pl

Security

We approach the protection of data concerning you appropriately and constantly develop our systems and security processes. The security measures we use include:

- limited physical access to our buildings and user access to our systems - only for those who are authorized
- control mechanisms such as firewall, user verification, strong data encryption and separation of roles, systems and data
- proactive monitoring

We also use the highest standards in the industry to support the maintenance of a robust information security management system.

What data are we processing?

We process data that you provide or leave as part of the use of individual Website services. These are data that you provide as part of the shared forms, as well as data that you leave as part of navigating the Website, i.e. data you leave in the cookies or those you provide to us during contact.

We also store http queries addressed to the server. The browsed resources are identified by URL addresses and concern, among others, public IP address of the terminal device from which the query came, time of arrival of the query, number of data sent by the server, URL of the page previously visited by the User (link referer) - when the Website was accessed via an external reference, information about errors that occurred during execution of the http transaction.

Purposes, legal basis, period for which data will be stored

	The purpose of the processing		Legal basis	Period for which data will be stored
1.	Registration and participation in the event.	By using the registration form, you can register your participation in an organized or promoted event. The collected personal data will be processed in order to enable you to participate and to conduct a survey and rate participants' satisfaction.	article 6(1)(b) of the GDPR article 6(1)(f) of the GDPR	For the period necessary to achieve the purpose of processing. After realization, the data will be archived and not used outside the purpose of investigation, defense or mutual settlement of claims during the period of limitation.
2.	Conclusion and performance of the contract.	You can use the services we provide, including using the Website. The collected data will be processed in order to cooperate and provide the service under	article 6(1)(b) of the GDPR	For the duration of the negotiations or provision of the service. After realization, the data will be archived and not used outside the

		certain conditions.		purpose of investigation, defense or mutual settlement of claims during the period of limitation.
3.	Contact.	You can contact us including using the shared contact forms. The collected data will be processed to make contact, including to respond to your request.	article 6(1)(b) of the GDPR	For the period necessary to achieve the purpose of processing. After realization, the data will be archived and not used outside the purpose of investigation, defense or mutual settlement of claims during the period of limitation.
4.	Publishing comments on the blog.	You can comment on the blog entry published by us on the Website. The collected data will be processed in order to implement the publication of the comment.	article 6(1)(b) of the GDPR	For a period necessary to complete the purpose of processing, no longer than to delete the comment. After realization, the data will be archived and not used outside the purpose of investigation, defense or mutual settlement of claims during the period of limitation.
5.	Recruitment.	You can send us your application (CV). The collected personal data will be processed for recruitment purposes, or in case of additional consent also for the purpose of future recruitment or sending information about recruitments..	article 6(1)(a-b) of the GDPR	For a period necessary to complete the purpose of processing, in the case of additional consent, no longer than until the consent is withdrawn. After realization, the data will be archived and not used outside the purpose of investigation, defense or mutual settlement of claims during the period of limitation.
6.	Providing demo versions of proprietary applications.	With the use of a shared form, you can submit an application for access to the demo versions of APN Promise's own application. Personal data collected in the above process will be processed in order to fulfill your request, including respond to your request and offer and provide you with services related to APN Promise's own applications.	article 6(1)(b) of the GDPR article 6(1)(f) of the GDPR	For a period necessary to complete the purpose of processing, no longer than to delete the comment. After realization, the data will be archived and not used outside the purpose of investigation, defense or mutual settlement of claims during the period of limitation.
7.	Sending commercial information.	Sending commercial information is based on the fact that after You have given Your prior consent to the given data by You e-mail address or telephone number, commercial information is provided.	article 6(1)(a) of the GDPR	For the period necessary to achieve the purpose of processing, however, not longer than until you withdraw your consent and after that solely to defend against claims during the period of limitation.
8.	Marketing.	In this case, personal data obtained during Your use of the Website, for example a newsletter, shall be used. An information about the APN Promise offer is sent to the e-mail address or phone number indicated by You. The targeted purpose may also be implemented by displaying a personalized advertisement based on profiling.	article 6(1)(f) of the GDPR article 6(1) (b) of the GDPR	Until the objection to processing has been filed and after that solely to defend against claims during the period of limitation.
9.	Web push	Web push means that the browser address will ask if you agree to receive notifications. You have the option of accepting or blocking notifications. The content of the notification is created by the browser without the possibility of interfering.	article 6(1)(a) of the GDPR	Until you withdraw your consent and after that solely to defend against claims during the period of limitation.
10.	Cookies.	Cookies are used mainly to provide the User with services and improve the quality of these services, in particular the Website.	article 6(1)(f) of the GDPR	Until an effective opposition to processing has been reported and after that solely to defend against claims during the period of limitation.
11.	Legal obligation.	Sometimes we are required to process your personal information by law or the	article 6(1)(c) of the GDPR	For the period necessary to fulfill legal obligation or over the

		processing of your personal information is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.		limitation period of potential claims.
12.	Data protection rights realization	The data will be processed only to the extent necessary to identify and verify the identity of the requesting person.	article 6(1)(c) of the GDPR	Until the rights of the data subject are fulfilled and after that solely to defend against claims during the period of limitation.
13.	Safety and security	We can use your personal information to help provide safe and secure environments for our services.	article 6(1)(f) of the GDPR	Until an effective opposition to processing has been reported and after that solely to defend against claims during the period of limitation.

Is there an obligation to provide data?

Providing any personal data on the Website is completely voluntary, however, it may be necessary to perform specific services or requests of the User, e.g. in the area of contact, conclusion of a contract, performance of the data subject's rights or participation in an event or competition.

The recipients of the personal data

In the scope of processing your data, we can use the so-called processors who, at our request, provide us with elements of services or provide them in full, while carrying out the processing process. We have entered into contracts with our processors - this means that these entities cannot do anything with your personal data apart from the processing authorization we have granted. They cannot disclose your data to any third party other than us (unless the law provides otherwise) and are obliged to maintain full confidentiality and security of data storage for the period of cooperation, and after its completion to return the information received or delete it.

In some circumstances, we may be legally required to share information about you - for example, under a court order, law or public authority decision. In any case, we make sure that we have a legal basis to share information about you and document our decisions. If we inform you about it in advance, we may also share your data with i.e. partners of events organized by us. In such a situation, your recipients become the data controllers of your data in the scope of the processing authorization granted by you and are obliged, in accordance with the GDPR, to inform you about the processing in accordance with art. 14 GDPR.

Transfer of data to the so-called third country

We may transfer your personal data to our suppliers, Partners or service providers located outside of the European Economic Area (EEA) to the purposes of processing. In any case, if your data can be found outside the EEA, we will inform you about it.

At the same time, taking care of the security of your data, we strictly follow the rules of their transfer resulting directly from the GDPR and provide data only where the degree of security is guaranteed in accordance with the decisions of the European Commission or by other legal instruments (e.g. standard contractual clauses).

Your data protection rights

In accordance with the provisions of the law on the protection of personal data, you have specific rights depending on the basis for processing your data.

Right of access

You have the right to find out whether we use or store your personal data - the so-called right of access. By exercising this right, you can also ask us for a copy of your data.

Right to rectification

You can question the accuracy and content of the data we process and ask for their correction or deletion. This is known as the "right to rectification". If your data is incomplete, you can also ask us to complete it, i.e. by adding new information or modifying the existing information.

Right to erasure

You can ask us to delete your data. This permission is also known as the so-called "Right to be forgotten" and is not absolute. According to the GDPR, the right to delete data is effective, among others in the following circumstances, when:

- we no longer need your data
- you initially consented to the processing, but now you have withdrawn it
- you have objected to the use of your data
- we have processed your data unlawfully

We may deny you the right to "be forgotten" in the following circumstances:

- when we are required by law to store your data
- data storage is necessary to establish, exercise or defend claims

Right to restriction of processing

You have the right to limit the manner and extent to which we use your data, especially if you are concerned about the truthfulness of the information we have or how we use it. If necessary, you can also request the deletion of certain information about you (see "right to erasure"). This right is closely related to your rights to contest the accuracy of your data and to object to its use.

Right to object to processing

In certain circumstances, you have the right to object to the processing (use) of your data, e.g. in a situation where you do not agree to processing based on a legitimate interest. If your objection is justified, we must stop using your data for the purpose for which it was originally processed, unless we are able to provide reasons justifying the further use of your data despite the objections raised.

You have the absolute right to object to the use of your data for marketing purposes. In this case, if you object, we will absolutely stop using your data for this purpose.

Right to data portability

You have the right to obtain your personal data in an accessible and readable manner, e.g. in the form of an excel file. You also have the right to ask us to transfer your data to another entity - we will do it if the transfer is, as the GDPR says, "technically feasible". This right applies only to the information that you provided to us on the basis of your consent or in the implementation or negotiation of contract terms, and the processing is carried out in an automated manner.

Right to withdraw consent

If your data is processed on the basis of consent, You can use the right to withdraw it at any time - remember that this withdrawal does not affect the compliance of the processing before it is made.

Right to lodge a complaint with a supervisory authority

We work to high standards when it comes to the processing of your personal data. If you have any questions or concerns, please contact us and we will certainly answer.

If you remain dissatisfied with the content of the answer or the exercise of your right, you can submit a complaint to the competent supervisory authority for the protection of personal data - in Poland to the [President of the Office for Personal Data Protection](#).

Execution of your rights

You can request the execution of your rights in oral or written form. If you give us your request orally, we recommend that you also send it in writing or via email - in order to leave a clear evidence of your correspondence. This will also provide us with confirmation of your position or requests and will allow us to respond to your requests and in accordance with the content of your expectations as soon as possible.

We do not charge fees for the implementation of your rights and we try to provide information within no more than a month - if it turns out that we need more time, we will inform you about it. In certain cases, we may charge an appropriate fee, e.g. if you request a copy of the data again - however, we will inform you about it in advance.

There are many ways You can contact us, including by phone, email and post.

- Phone: +48 (22) 355 16 00
- e-mail: promise@promise.pl or iodo@promise.pl
- Postal address: Domaniewska 44A Street, 02-672 Warszawa or
- using the contact form on the Website

Cookies

The website uses cookies, which are IT data, in particular text files, which are stored on the User's end device. Cookies usually contain the name of the website they come from, the storage time on the end device and a unique number.

The entities that place information in the form of cookies on the device with which you use the Website and access them are APN Promise and its Partners, among others analytical service providers, advertisers, application developers. This Policy regulates the processing of data related to the use of own cookies. Each of the Partners defines their own rules for the use of cookies in their privacy policies, which we recommend that you read.

Using

We use Cookies for the following purposes:

- providing Website services
- facilitate the use of the Website while browsing
- subsequent identification in the event of the Website being re-connected to the device on which it was saved
- creating statistics that help us to understand how Website Users use websites, which allows improving their structure and content
- the adaptation of web content to the specific preferences of the service and optimize the use of websites tailored to the individual needs of the User
- advertising presentation, incl. in a way that takes into account the interests of the User
- exchange of information with Partners to mediate in the provision of their services

What Cookies do we use?

As part of the Website, we may use the following types of cookies:

- necessary - which are necessary for the proper functioning of the Website, ensuring the basic functions and security of the Website

- functional - which help to perform certain functions, such as sharing site content on social media platforms, collecting feedback and other third party functions
- performance - which are used to understand and analyze the Website's key performance indicators, which helps provide a better user experience
- analytical - which are used to understand how Users interact with the Website, helping to provide information about the number of Users, bounce rate, traffic source, etc.
- advertising - which are used to provide Users with relevant advertisements and marketing campaigns, tracking visitors on the Website and collecting information in order to deliver tailored advertisements
- other - which are analyzed and have not been matched to any category

Settings management

Cookies classified as necessary are by default allowed to be stored on the User's end device. The use by us and our Partners of the other categories of cookies (functional, performance, analytical, advertising, other) depends on obtaining the User's consent to use each of the cookie categories separately.

You can change the settings in this regard at any time, i.e. withdraw your consent to the use of cookies, separately for each cookie category, via the Website. In addition, the web browser allows you to delete cookies, and detailed information on this subject can be found in the help or documentation of the web browser you use.