

# **PRIVACY POLICY**

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### 1. Definitions

- **1.1. Controller** Przedsiębiorstwo Usług Inżynieryjno-Budowlanych Eljot Jacek Luterek, ul. Eugeniusza Kwiatkowskiego 1 lok. 21, 71-004 Szczecin, NIP number 8571052862.
- **1.2. Mobile Application** software supplied by the Controller that runs on iOS and Android-based mobile devices.
- **1.3. Personal Data** information about a natural person who is or can be identified using one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including device IP address, location data, Internet handle or information collected using cookies or similar technology.
- **1.4. Policy** this document, i.e. the privacy policy.
- **1.5. GDPR** 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.
- **1.6. Website** an Internet website operated by the Controller at https://www.ready2report.com/
- **1.7. User** any natural person visiting the Website or using one or more services or functionalities listed in the Policy, including the Application.

### 2. Basic information

- **2.1.** The overarching purpose of this Privacy Policy is to advise you on the processing of Personal Data carried out because of your use of the Website and Application.
- **2.2.** The entity that decides on the purposes and manner of processing Personal Data due to your use of the Website and Application is the personal data Controller.
- **2.3.** Note that sometimes it is you who decides on the purposes and manner of personal data processing: when you are an entrepreneur and you enter with us into an agreement to provide services electronically then you entrust personal

- data processing to us (for example the data of employees or business partners which you enter into the Application or Website.)
- **2.4.** These issues are discussed in detail in this document. We are committed to providing you with full information on what happens to the personal data we manage or that you entrust to us for processing and on what basis.

## 3. Data Protection Officer

- **3.1.** Pursuant to the GDPR, the Controller is not obliged to appoint a Data Protection Officer. Please note, however, that this does not affect the level of protection your privacy is safeguarded by professionals who monitor compliance with internal procedures to ensure that the Personal Data of all our Users are safe.
- **3.2.** If we appoint a Data Protection Officer in the future, you will receive a notification.

### 4. Legal basis for and purposes of Personal Data processing

- **4.1.** We process the Personal Data of Users in varying scope and on varying legal basis specified in the GDPR. The details depend on the purpose of processing your data. In particular, we may process your Personal Data on the basis: of
  - 4.1.1. **Article 6(1)(a) of the GDPR**, when you consented to the processing of your personal data, for example to receiving a newsletter.
  - 4.1.2. **Article 6(1)(b) of the GDPR**, when you entered or intend to enter into a contract with us (including electronically), if you started to cooperate with us, or if you lodged a complaint using the tools available in the Website or Application;
  - 4.1.3. **Article 6(1)(c) of the GDPR**, when we comply with our legal obligations, for example when we issue invoices/bills, store documentation related to concluded agreements, or file tax returns or other regulatory reporting.
  - 4.1.4. **Article 6(1)(f) of the GDPR**, when we process your data because of our legitimate interest, such as for example the establishment, exercise or defence of legal claims, compliance with the obligations of a website administrator, replying to your inquiries (including inquiries submitted via forms available on the Website or the Application), or collecting your data for analytical, administrative or statistical purposes.

- **4.2.** Remember that we process the Personal Data of Users only insofar as we are entitled to do so.
- **4.3.** Consider also that Personal Data collected for the purpose of entering into a contract or complying with a legal obligation are, under certain conditions (Article 6(4) of the GDPR), also allowed to be processed for the purpose of one or more legitimate interests of the Controller. The prerequisite for this is, however, that processing the data for another purpose is compatible with the purpose for which the data were initially collected.

# 5. Methods of collecting personal data by the Controller

**5.1.** As part of Website and Application functionality, the Controller processes (or can process) the following Personal Data or information that might be classified as Personal Data:

### 5.1.1. Data provided by you:

You need to provide your Personal Data if you wish to enter with us into an agreement to provide services electronically or use certain functionalities of the Website or Application. We always distinguish between mandatory Personal Data and Personal Data which you can submit voluntarily. In particular, you submit to us data such as your: first and last name, business name, phone number, e-mail address, NIP number

It can also happen that you use the tools we provide to facilitate communications between us. For example, if you write to us using the contact form available on the Website, you will be asked to enter your first and last name and e-mail address so that we can get back to you.

# 5.1.2. Data we receive automatically when you use the Website or Application:

#### Geolocation data

While you use the Website or Application, we can automatically obtain the IP Address of your device, details about your ISP, and other information allowing us to determine your geographical coordinates.

### • Information obtained by Google Analytics

The Controller uses Google Analytics to improve its services. Google Analytics is a tool dedicated to collecting anonymous information about Website visits, such as time spent in the Website, pages displayed, or moving between pages.

If you do not want to provide us with such information, you can install a browser add-on that blocks Google Analytics. For more information, visit: <a href="https://support.google.com/analytics/answer/181881?hl=pl">https://support.google.com/analytics/answer/181881?hl=pl</a>

#### Information in server logs

Each use of our resources in the Service or Mobile Application leaves a trace in our server logs, where details such as the IP address of the device used to connect and the date and time of connection are recorded.

#### **5.1.3. Cookies**

- Cookies mean bits of information, such as in particular text files stored in the terminal devices of Users. These files allow us to recognise the User's device and display the Website in a manner customised to the User's preferences. Cookies usually contain the website address they originate from, the time of storage in the terminal device, and a unique identifier.
- Our cookies are "first-party cookies", and can be either permanent or temporary. These are necessary cookies, without which the Website won't work properly or be able to provide certain features and functionalities.
  Some of these may be manually disabled in your browser, but may affect the functionality of the Website.
- Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.
- Site management cookies are used to maintain your identity or session on the Website so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.
- Analytics cookies monitor how Users reached the Website, and how they interact with and move around once on the Website. These cookies let us know what features on the Website are working the best and what features on the Website can be improved.

### 5.1.4. Do you want to remove cookies?

Software used to browse Internet websites usually allows placing cookies on the terminal device by default. Remember, however, that you can change these settings at any time so as to block the automatic handling of cookies. Detailed information about the possibility and manner of handling cookies can be found in software (Web browser) settings.

Note that restricting the use of cookies may affect certain functionalities available in the Website.

Example information about removing cookies in selected browsers:

- Edge
- Internet Explorer
- > Chrome
- > Safari
- > Firefox
- Opera

#### Mobile devices:

- > Android
- > Safari (iOS)
- Windows Phone

# 6. Entities we can share Personal Data with

- **6.1.** Your Personal Data may be shared with other entities. Making the Website and Application available for you would not be possible without working with our partners, in particular those that provide IT, legal, collection, HR, accounting, transport, courier and mail services to us.
- **6.2.** There are also other entities we must share your Personal Data with, such as those that can request your data based on provisions of law (e.g. the Tax Office).

# 7. Marketing and newsletter consents

**7.1.** Upon registering in the Website or Application, you can grant us your voluntary consent to process your personal data and provide you with the newsletter service. The newsletter will be used to send you news about the Website and Application, special offers, or planned and implemented changes.

- **7.2.** When you register your account in the Website or Application, we will ask you also whether you want to consent to being contacted by e-mail and text messages. We will contact you using these communication channels primarily to promote our services, i.e. send you information about what's new in the Website and Application.
- **7.3.** You can also consent to be contacted by phone for marketing purposes. If you grant such consent, we will be able to call you to discuss our available services and promotions with you.
- **7.4.** To carry out marketing activities, we will use, depending on the scope of the consent you granted, such personal data as: First name, last name, e-mail address, phone number
- **7.5.** Remember that you can withdraw your consent for data processing, either for all of the above purposes, or some of them, at any time.
- **7.6.** Granting marketing and newsletter consent is entirely voluntary and does not affect your ability to enter into an agreement with us and the quality of its future performance.
- **7.7.** Please note that we do not intend to use your data for marketing purposes in a manner causing disruption or annoyance to you you can expect to be contacted by us no more than once per week, unless you decide otherwise and ask for such contact.

# 8. Transferring data to third countries

- **8.1.** As a rule, we will not transfer your personal data to a third country or international organisation located outside the EEA (European Economic Area).
- **8.2.** Transferring data to Google LLC as part of the Google Analytics service is an exception, as Google uses standard contractual clauses for this purpose.

# 9. Personal data retention periods

**9.1.** The period for which personal data are processed by the Controller depends on the type of service provided and the purpose of processing. The data are processed, as a rule, as long as a service is being provided or an order is being completed, until you withdraw your consent or submit an effective objection to

processing data in instances where the legal basis for data processing is the legitimate interest of the Controller.

- **9.2.** The data processing period may be extended when the processing is necessary to the establishment, exercise or defence of legal claims, and subsequently only when and insofar as required by provisions of law. Once the processing period ends, the data are irretrievably deleted or anonymised.
- **9.3.** We declare that, when you stop paying for our services, your main user account together with any data you submitted will be stored for 12 months from the last payment date. After this time, the account and the data will be deleted.

## 10. User rights

**10.1.** Pursuant to the GDPR, the User has the following rights related to the processing of their Personal Data by the Controller:

### 10.1.1. Right to access Personal Data

You have the right to obtain from the Controller confirmation as to whether your Personal Data are processed, and if so, to what extent and for what purposes (see Article 15(1) of the GDPR for details).

### 10.1.2. Right to rectification of processed data

You are entitled to request that the Controller immediately rectify your Personal Data if they are inaccurate.

### 10.1.3. Right to erasure of data ("right to be forgotten")

If it turns out that your personal data are no longer necessary in relation to the purposes for which they were collected, if an effective objection is submitted, if the data are processed unlawfully, if the data must be erased for compliance with a legal obligation under Polish or EU law, you can request that the data be erased immediately.

### 10.1.4. The right to restrict the processing of personal data

You have the right to request the Controller to restrict the processing of your personal data – this obliges the Controller to restrict the processing

of your data solely to their storage. The processing of data beyond their storage is possible only if one of the following prerequisites is met:

- you granted your consent for the processing;
- the processing is required for the establishment, exercise or defence of legal claims;
- the processing is required to protect the rights of another natural or legal person;
- the processing is required due to important public interest of the EU or a member state.

### 10.1.5. Right to data portability

You have the right to transmit processed data in an automated manner directly to another controller, if the processing is based on your consent (Article 6(1)(a) of the GDPR) or on a contract (Article 6(1)(b) of the GDPR) and it is technically feasible.

### 10.1.6. Right to object to further processing of data

You are entitled to object to the processing of your personal data – this right is sometimes absolute or it can apply only in certain circumstances. If the right is of absolute nature, it can serve as a basis for erasure of data.

As a rule, if you decide to object to the processing of your Personal Data, the objection may be effective if the Controller does not demonstrate that it has any valid, legitimate grounds to process your data which override your interests, rights and freedoms or that your Personal Data will be necessary for the potential establishment, exercise or defence of legal claims.

#### 10.1.7. Right to withdraw your consent

You can withdraw the consent you granted to us at any time. Remember, however, that withdrawing your consent does not affect the lawfulness of processing based on the consent prior to its withdrawal. Note also that you cannot withdraw your consent for the processing of Personal Data when you have not granted it, for example when your data are processed to perform a contract.

#### 10.1.8. Right to lodge a complaint with a supervisory authority

You can notify the President of the Personal Data Protection Office directly if you object to our processing of your Personal Data. For more details, see https://uodo.gov.pl/pl/p/skargi.

- **10.2.** Any User who wants to exercise their rights can contact the Controller via e-mail by sending a message to <a href="mailto:rodo@ready2report.com">rodo@ready2report.com</a> or via the contract form found in the Website.
- **10.3.** The exercise of any of the above rights occurs at the request of the User. The Controller will carefully analyse the User's request and send a reply immediately, not later than within one month from the date of receiving the request.
- **10.4.** The Controller reserves the right to make a reply by the date later that stated above (up to two months) due to the number of inquiries or the complicated nature of a submitted inquiry. In such case, the Controller will notify the User of this fact within one month from the date on which the User submitted the request.

## 11. Voluntary nature of providing personal data

- **11.1.** Providing personal data in the Website or Application is entirely voluntary we cannot force you to use our tools. If, however, you would like to make use of the services we offer, not providing your data will hinder us from entering into a contract and complying with our legal obligations (for example, we will be unable to issue you an invoice, even though we are required to do so). Consequently failure to provide your data, even voluntarily, will prevent you from entering into an agreement with us.
- **11.2.** Elsewhere, where your consent is required for the processing of personal data, providing your data is entirely voluntary.

# 12. Entrusting personal data processing

**12.1.** Note that if you are an entrepreneur and enter with us into an agreement to provide services electronically, you automatically entrust to us the processing of the data you are the controller of. This usually applies to the data of your employees which you enter into the Application so that they can use it.

**12.2.** More details on entrusting personal data can be found in the draft data processing agreement which forms an appendix to our rules of providing services electronically.

# 13. Updates of the Privacy Policy

- **13.1.** Our intention is to constantly improve the quality of service we provide while ensuring that your Personal Data are fully protected. Our Website and Application will change over time and so will the Privacy Policy we have drafted for you.
- **13.2.** We have made every effort to explain these issues to you. If, however, something seems unclear, please write to us at: <a href="mailto:rodo@ready2report.com">rodo@ready2report.com</a>.