

PRIVACY POLICY OF PAYSKIN.GG

1. DEFINITIONS

1.1. **Controller** – Payskin sp. z o.o. with its registered office in Katowice, ul. Zabrska 16/2, 40-082 Katowice.

1.2. **Personal Data** – any information relating to an identified or identifiable natural person by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including device IP, location data, an online identifier or information collected via cookies and other similar technology.

1.3. **Policy** – this Privacy Policy.

1.4. **GDPR** – 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.

1.5. **Website** – the website operated by the Controller at <https://payskin.gg/>

1.6. **User** – any natural person who visits the Website or uses one or more services or functionalities described in the Policy.

1.7. Other capitalised terms in the Policy that have not been defined above have the meaning defined in the Terms and Conditions.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

2.1. In connection with the use of the Website by the User, the Controller collects data to the extent necessary to provide services by electronic means as well as information about the User's activity on the Website. The principles and purposes of the processing of Personal Data collected during the use of the Website by the User are described below.

3. PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA ON THE WEBSITE

USE OF THE WEBSITE

3.1. Personal Data of all persons using the Website (including IP address or other identifiers and information collected via cookies or other similar technologies) is processed by the Controller for the purpose of:

- 3.1.1. providing services by electronic means in the scope of making the content collected on the Website available to Users – the legal basis for the processing is the necessity of processing for the performance of the agreement (Art. 6 sec. 1 letter b of the GDPR);

- 3.1.2. analytical and statistical analysis – the legal basis for the processing is a legitimate interest of the Controller (Art. 6 sec. 1 letter f of the GDPR), consisting in analysing the activity of the Users and their preferences in order to improve the functionalities used and services provided;
- 3.1.3. establishing and exercising claims or defending against claims, if necessary – the legal basis for the processing is a legitimate interest of the Controller (Art. 6 sec. 1 letter f of the GDPR), consisting in defending its economic interests;
- 3.1.4. the Controller's marketing – the principles of the processing of Personal Data for the purposes of marketing are described in the **MARKETING** section.

3.2. The User's activity on the Website, including their Personal Data, is recorded in system logs (a special computer program used to store a chronological record containing information on events and activities concerning the IT system used to provide services by the Controller). The information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes this data for technical and administrative purposes, for the security and management of the IT system, as well as for analytical and statistical purposes – in this regard, the legal basis for the processing is a legitimate interest of the Controller (Art. 6 sec. 1 letter f of the GDPR), consisting in providing and improving the functionalities offered to Users.

CHAT

- 3.3. The Controller offers the User the possibility of contacting it via live chat available on the Website.
- 3.4. The Personal Data of the User using the chat function is processed for the purpose of:
 - 3.4.1. communicating with the Controller and for the purposes arising therefrom – the legal basis for the processing is its necessity for the performance of the chat service agreement (Art. 6 sec. 1 letter b of the GDPR);
 - 3.4.2. establishing and exercising claims or defending against such claims by the Controller, if necessary – the legal basis for the processing is a legitimate interest of the Controller (Art. 6 sec. 1 letter f of the GDPR), consisting in defending its economic interests.

CONTACT FORM

- 3.5. The Controller offers the possibility of contacting it via an electronic contact form. Using the form requires the provision of Personal Data necessary to contact the User and respond to the inquiry, that is first name, last name and email address. The User may also provide other data in order to facilitate contact or the handling of the inquiry, that is phone number and website address. The provision of data marked as necessary is required in order to receive and handle the inquiry, and the failure to provide the data results in the inability to handle the inquiry. The provision of other data is voluntary.
- 3.6. The Personal Data of the User using the contact form is processed for the purpose of:
 - 3.6.1. handling an inquiry submitted via the contact form – the legal basis for the processing is the necessity of processing for the performance of the service agreement (Art. 6 sec. 1 letter b of the GDPR); with regard to the processing of

optional data, the legal basis for the processing is the consent given (Art. 6 sec. 1 letter a of the GDPR);

3.6.2. exercising or defending against claims – the legal basis for the processing is a legitimate interest of the Controller (Art. 6 sec. 1 letter f of the GDPR), consisting in protecting its rights.

DIRECT MARKETING

3.7. The User's Personal Data may also be used by the Controller to send marketing content via email and push messages. Such actions are only taken by the Controller if the User has given their consent, which they can withdraw at any time.

SOCIAL MEDIA

3.8. The Controller processes the Personal Data of Users who visit the social media profiles of the Controller on Facebook, Twitter, Instagram, LinkedIn. The data is processed solely in connection with the operation of the profile, including for the purpose of informing the Users about the Controller's activity and promoting various events, services, and products, as well as for analytical and statistical purposes. The legal basis for the processing of personal data conducted by the Controller for this purpose is its legitimate interest (Art. 6 sec. 1 letter f of the GDPR), consisting in promoting its own brand and analysing the preferences and activity of Users visiting the Controller's social media profiles in order to improve the functionalities used and services provided.

4. MARKETING

4.1. The Controller processes the Personal Data of Users to perform marketing activities, such as:

4.1.1. Carrying out activities related to direct marketing of goods and services by sending commercial information via email or push messages.

4.2. To perform marketing activities, the Controller uses profiling in some cases. This means that, through automated data processing, the Controller evaluates selected factors concerning Users in order to analyse their behaviour or make a forecast for the future. This allows better adjustment of the displayed content to the User's individual preferences and interests.

BEHAVIOURAL ADVERTISING

4.3. The Controller and its trusted partners process Users' Personal Data, including Personal Data collected via cookies and other similar technologies, for marketing purposes in connection with targeting the Users with behavioural advertising (i.e. advertising that is tailored to their preferences). Then, the processing of Personal Data also includes the profiling of Users.

4.4. A list of the Controller's trusted partners can be found at: Google, Facebook and Tidio.

5. COOKIES AND SIMILAR TECHNOLOGY

Cookies are small files that are saved and stored on your local computer or another device when you visit various websites on the Internet.

5.1. The Controller uses the following cookies on the Website:

- Essential cookies – enable basic functions like Website navigation. The Website cannot function properly without these cookies.
- Preference cookies – allow setting information that affects the appearance or operation of the Website, such as preferred language.
- Statistical cookies – are used to track Website statistics, e.g. number of visitors, type of operating system, type of browser used to browse the Website, time spent on the Website, etc.
- Marketing cookies – are used to display ads that are relevant and interesting to individual users.

6. ANALYTIC AND MARKETING TOOLS USED BY THE CONTROLLER'S PARTNERS

6.1. The Controller and its Partners use various solutions and tools for analytical and marketing purposes. Below you will find some basic information on these tools. For details, please refer to the privacy policy of the respective partner.

6.2. An up-to-date and complete list of the Controller's Partners is available at: Google, Facebook and Tidio.

GOOGLE ANALYTICS

Google Analytics cookies are files used by Google in order to analyse the usage of the Website by the User to compile statistics and reports on the operation of the Website. Google does not use the collected data to identify the User and does not combine this information to enable identification. Detailed information on the scope and rules of data collection related to this service can be found at: <https://www.google.com/intl/pl/policies/privacy/partners>.

META PIXEL

Meta Pixel is a tool to measure the effectiveness of advertising campaigns conducted by the Controller on Facebook. The tool enables advanced data analytics in order to optimise the Controller's operations also with the use of other tools offered by Facebook. Detailed information on data processing by Facebook can be found at: https://pl-pl.facebook.com/help/443357099140264?helpref=about_content.

HOTJAR

HotJar is a tool enabling the Controller to conduct analyses of User activity on the Website, e.g. through questionnaires or satisfaction surveys, and by anonymously collecting information about clicks on particular parts of the Website. The tool does not enable User identification. Detailed information on the data collected via HotJar and how to deactivate User monitoring are available at: <https://www.hotjar.com/privacy>.

7. MANAGING COOKIE SETTINGS

The instruction on how to change your cookie settings in the most popular browsers is presented below:

Google Chrome

Menu > Settings > Show advanced settings > Privacy > Content settings > Cookies – select the appropriate option

Internet Explorer

Menu > Tools > Internet options > Privacy – select the appropriate option.

Mozilla Firefox

Menu > Options > Privacy > History – select the appropriate option.

Opera

Menu > Preferences > Advanced > Cookies – select the appropriate option.

Safari

Menu > Preferences > Privacy > Cookies – select the appropriate option.

8. PERIOD OF PROCESSING PERSONAL DATA

8.1. The period of processing of data by the Controller depends on the type of service provided and the purpose of processing. In principle, the data is processed for the period of provision of the service, until the withdrawal of the consent granted or until an effective objection is made to the processing of the data, in cases where the legal basis for data processing is a legitimate interest of the Controller.

8.2. The period of data processing may be extended when the processing is necessary for the establishment and exercise of possible claims or defence against them, and thereafter only if and to the extent required by law. After the expiry of the processing period, the data is irreversibly deleted or anonymised.

9. RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA:

DATA SUBJECT RIGHTS

9.1. Data subjects have the following rights:

- 9.1.1. **the right to information about the processing of personal data** – on this basis, the Controller provides the natural person submitting the request with information about the processing, including in particular the purposes and legal basis of the processing, the scope of the data held, the entities to which the data is disclosed and the planned erasure date;

- 9.1.2. **the right to obtain a copy of data** – on this basis, the Controller provides a copy of the processed data concerning the natural person submitting the request;
- 9.1.3. **the right to rectification** – the Controller is obliged to rectify any inconsistencies or errors in the Personal Data processed and to complete it if it is incomplete;
- 9.1.4. **the right to erasure of data** – on this basis, one can request erasure of data whose processing is no longer necessary for any of the purposes for which it was collected;
- 9.1.5. **right to restriction of processing** – if such a request is submitted, the Controller ceases performing operations on the Personal Data – except for operations to which the data subject has consented – and storing it, in accordance with the retention principles adopted or until the reasons for the restriction of data processing cease to exist (e.g. a supervisory authority issues a decision authorising further processing);
- 9.1.6. **the right to data portability** – on this basis – insofar as the data is processed by automated means in connection with an agreement concluded or consent given – the Controller issues the data provided by the data subject in a computer-readable format. It is also possible to request that this data be sent to another entity, provided that the technical capacity to do so exists on the side of both the Controller and the designated entity;
- 9.1.7. **the right to object to the processing of data for marketing purposes** – if applicable, the data subject may object at any time to the processing of Personal Data for marketing purposes, without having to justify such an objection;
- 9.1.8. **the right to object to other purposes of the processing** – the data subject may object at any time – on grounds relating to their particular situation – to the processing of Personal Data which is carried out on the basis of a legitimate interest of the Controller (e.g. reasons relating to property protection); an objection in this respect should contain a justification;
- 9.1.9. **the right to withdraw consent** – if the data is processed on the basis of the consent given, the Data Subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before its withdrawal;
- 9.1.10. **the right to complain** – in the event that the processing of Personal Data is considered to infringe the GDPR or other provisions relating to the protection of Personal Data, the Data Subject may lodge a complaint with the authority supervising the processing of Personal Data which is competent for the Data Subject's habitual residence, place of work or the place of the alleged infringement. In Poland, the supervisory authority is the President of the Personal Data Protection Office.

10. SUMITTING REQUESTS RELATED TO THE EXERCISE OF RIGHTS

10.1. A request related to the exercise of Data Subjects' rights can be submitted:

10.1.1. in writing to the Controller's address;

10.1.2. via e-mail to the following address: office@payskin.gg

10.2. The request should, as far as possible, indicate precisely what is being requested, i.e. in particular:

10.2.1. what right does the applicant wish to exercise (e.g. right to obtain a copy of data, right to erasure of data, etc.);

10.2.2. what processing does the request concern (e.g. use of a particular service, activity on a particular website, etc.);

10.2.3. what purposes of processing does the request concern (e.g. purposes related to the provision of services, etc.).

10.3. If the Controller is unable to identify the natural person on the basis of the request submitted, it will ask the applicant for additional information. It is not compulsory to provide such data, but failure to do so will result in the request being refused.

10.4. The request may be submitted in person or by proxy (e.g. family member). To ensure data security, the Controller encourages the use of a power of attorney in a form certified by a notary public or an authorised legal adviser or advocate, which will significantly speed up the verification of the authenticity of the request.

10.5. The application should be processed within one month of receipt. If it is necessary to extend this period, the Controller informs the applicant of the reasons for this action.

10.6. If the request has been sent to the Controller electronically, the response will be provided in the same form, unless the applicant has requested a response in another form. In other cases, the response is provided in writing. If the deadline for the processing of the request renders it impossible to provide response in writing, and the scope of the applicant's data processed by the Controller enables contact by electronic means, the response will be provided by electronic means.

11. DATA RECIPIENTS

11.1. In certain cases, insofar as it is necessary to achieve the purposes described above, Personal Data will be disclosed to external entities providing services to the Controller (e.g. payment institutions, banks, paying agents, IT service providers, CRM providers, call centre service providers, analytical companies).

11.2. The Controller reserves the right to disclose selected information concerning the User to competent authorities or third parties who request such information, based on an appropriate legal basis and in accordance with the applicable law.

12. TRANSFER OF DATA OUTSIDE THE EEA

12.1. The level of Personal Data protection outside the European Economic Area (EEA) differs from that provided for by European law. For this reason, the Controller transfers

Personal Data outside the EEA only when necessary and only with an adequate level of protection, ensured primarily by:

12.1.1.cooperation with entities that process Personal Data in third countries for which a relevant decision on the provision of an adequate level of Personal Data protection has been issued by the European Commission;

12.1.2.the use of standard contractual clauses issued by the European Commission; together with the required additional security measures, they provide the same level of protection for Personal Data as it enjoys within the European Union;

12.1.3.the application of binding corporate rules approved by the competent supervisory authority.

12.2. The Controller always informs the User about its intention to transfer Personal Data outside the EEA at the stage of data collection.

13. CONTACT INFORMATION

13.1. The Controller may be contacted via the email address: office@payskin.gg or the Controller's correspondence address.

14. AMENDMEN TO THE PRIVACY POLICY

14.1. The Policy is reviewed on an ongoing basis and updated as needed.

14.2. The current version of the Policy was adopted and became effective on 13.11.2022 year.