

PRIVACY POLICY OF SIDLY SP. Z O. O.

The owner and the operator of www.sidly.eu (hereinafter referred to as “**Website**”) is SiDLY Sp. z o. o. with its registered seat in Warsaw, ul. Chmielna 2 lok. 31, 00-020 Warsaw (hereinafter referred to as “**SiDLY**”).

For us, confidentiality of data and protection of privacy are matters of priority. Out of respect for the Website users data security (hereinafter referred to as “**Users**”) and the law in force, including particularly the provisions of the Regulation No. 2016/679 of the European Union Parliament and of the Council as 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 “**RODO**”), SiDLY has established a privacy policy setting out the principles for collecting, processing and using the personal data of the Website Users (hereinafter referred to as “**Policy**”).

I. PERSONAL DATA ADMINISTRATOR

The administrator of the Website Users personal data is SiDLY.

II. INSPECTOR

In all matters with regard to processing personal data you may contact directly the inspector responsible for the protection of personal data appointed by SiDLY:

- by e-mail at the following address: iod@sidly.eu,
- by letter addressed to the seat of SiDLY to the attention of the Inspector of Personal Data Protection.

III. PURPOSES AND GROUNDS OF PERSONAL DATA PROCESSING

SiDLY processes personal data:

- in order to perform contractual obligations (art. 6, cl.1, let. b of RODO)

SiDLY processes personal data for the purpose of executing the contracts concluded with customers, or to carry out activities preceding such contracts;

- in order to fulfil legal obligations (art. 6, cl.1, let. c of RODO)

SiDLY is subject to a number of legal obligations, such as those imposed by accounting regulations;

- for purposes resulting from legitimate interests pursued by PBKM or a third party (art. 6, cl.1, let. f of RODO)

SiDLY may process personal data on the grounds of a legitimate interest in the following cases: Website User contact through a contact form, customer satisfaction survey, claims and defence against claims, ensuring the Website IT security;

- based on a consent (art. 6, cl.1, let. a of RODO)

If consented to, SiDLY shall process personal data for marketing purpose.

IV. DATA PROCESSING TIME

Personal data shall be processed for the period necessary to achieve the processing objectives, in particular:

- for the duration of performing the contract, and thereafter for the period required by law, or the period necessary to pursue possible claims arising from the contract;
- in terms of fulfilling legal obligations – for the time specified in applicable regulations;
- in terms of consented marketing – until such consent is withdrawn;
- for the time necessary to achieve legitimate interests of SiDLY.

V. PERSONAL DATA RECIPIENTS

Depending on the services and activities carried out, personal data of the Users may be transferred to:

- 1) authorised employees of SiDLY,
- 2) entities processing personal data on behalf of the Administrator, i.e. for example:
 - IT services providers;
 - entities providing consulting services, including accountancy;
 - entities cooperating with SiDLY, such as suppliers, distributors,
- 3) entities processing personal data on their own behalf e.g.:
 - payment services providers,
 - postal and courier services providers;
 - telecommunication services providers.

Your personal data shall not be transferred to any recipients outside the European Economic Area.

VI. RIGHTS RELATED TO PROCESSING OF PERSONAL DATA

The Users have right to :

- demand access to their personal data, rectify them, limit or delete the same,
- withdraw, at any time, their consent to processing their personal data, where such consent is the basis for processing,
- object against processing of personal data,
- demand the transfer of personal data,
- file a complaint to the President of Personal Data Protection Office.

VII. VOLUNTARY PROVISION OF PERSONAL DATA

Personal data are provided voluntary, however, there are times when it becomes necessary e.g. if you want to use SiDLY services, or if you fill in a contact form available on the webpage. SiDLY collects only those personal data which are indispensable for a specific purpose.

VIII. SOURCE OF PERSONAL DATA

In some cases, the personal data of Carers and/or users of SiDLY wristbands may not originate directly from those persons but from the organisations with which SiDLY has concluded a service contract.

IX. ACTIVITY ON THE WEBSITE

SiDLY informs that as soon as the User connects with the website <http://www.sidly-platform.com>, information about the number (including IP address or MSISDN number) and type of the terminal device used for connection by the User, appears in the system logs. SiDLY shall process the data in accordance with the law, including the data regarding the time of your connection and other operational data concerning the activity in the website. Such data are processed for technical purposes and in order to collect general statistical information.

The Website also automatically collects data contained in so-called cookie files as to gather information related to the Website use, to maintain the logging sessions on different pages of the Website, to adjust the Website to the Users' needs, and to create statistics on visiting

subpages of the Website. The User may at any time remove the placed cookie files or block their placement through the options available in the Internet browser. However, SiDLY warns that removing or blocking the placement of cookies may trigger difficulties in using the Website, or even make it impossible to use some of its options.

Cookie files (so-called "cookies") are small text files sent from the servers of visited web pages or applications, and stored by Internet browsers and other technological solutions on personal computers. Cookies make it possible to provide high quality service in the applied business model and improve the experience of using such service. Those files identify a person visiting the web page on the occasion of repetitive visits or a single visit in order to advance certain functionalities e.g. functions related to logging in, or to improve personalised information. SiDLY applies three types of cookies: (i) session cookies, (ii) persistent cookies, (iii) external cookies.

- **SESSION COOKIES**

These are essential cookies which enable users to navigate the website and to make use of its basic functions. They are used in one session only. Session cookies are anonymous and are used to: streamline and increase the operational efficiency of SiDLY websites.

- **PERSISTENT COOKIES**

Persistent cookies deliver specific functions not only within one session, but also for as long as the file is being stored on the computer. These are files related to the efficiency of the service and its functionalities.

These cookies collect the information on how the website is used, including data concerning visited webpages and possible errors. Functionality-related cookies facilitate provision of services and remember settings aiming at making it easier for users to explore our website.

Persistent cookies collect the following information on users: IP address and data giving us information about the source which guided users to the SiDLY website. Apart from IP address, SiDLY does not collect any other information that might reveal the user identity: they are processed as anonymous data and used exclusively to improve the operation of web pages, as well as to recognize the interests of visitors.

SiDLY applies those to:

1. streamline and increase the operational efficiency of SiDLY websites,
2. remember user settings regarding page layout, text size, colour preferences,

3. exchange information with SiDLY partners in order to provide services; information revealed this way are used exclusively to provide services, products and functions and not for any other purposes.

- **EXTERNAL COOKIES**

External cookies allow for cooperation with external companies or websites. They include research cookies providing analytical system with information as regards the service popularity. These are also files related to the functions such as 'like' or 'share' buttons. Applied external cookies are:

- 1) connections to social networking sites (e.g. Facebook), which can use the information about individual users' visits to profile advertisements on other web pages,
- 2) provision of data on webpage and applications traffic to research companies such as Google Analytics.