

## Privacy Policy Innovative Labs sp. z o.o.

Pursuant to Articles 13 and 14 of 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**"), we inform you that:

### **1. Data controller**

The controller of the personal data is Innovative Labs sp. z o.o. with its registered office in Warsaw, address: ul. Twarda 18, 00-105 Warsaw, entered in the Register of Entrepreneurs of the National Court Register by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under KRS number: 0001000197 ("**Controller**").

### **2. Data subjects**

The Controller processes the personal data of the following: persons using the Controller's websites, the Controller's contractors, representatives of contractors, persons contacting the Controller, and job applicants.

The personal data processed by the Controller include:

- a) personal data of the Controller's customers, first name, surname, residential address, e-mail address, telephone number, company, VAT number, contract number;
- b) personal data of client representatives: name, surname, position or function, business telephone number, and business e-mail addresses;
- c) personal data of persons contacting the Controller via the contact form or by e-mail: name, e-mail address, IP of the computer, and other personal data contained in the content of the inquiry;
- d) personal data of website visitors: IP number of the computer;
- e) personal data of job applicants: name, address, telephone number, address - email, and other personal data included in the job application.

### **3. Purposes and legal basis for processing personal data.**

Personal data will be processed for the purposes of:

- a) conclusion and implementation of the contract;
- a) the submission of individual offers to interested persons;
- b) issuing and retaining accounting documents;
- c) marketing;
- d) to carry out promotional programs organized by the Controller;
- e) conducting the recruitment process;
- f) to contact persons directing inquiries or messages to the Controller via the contact form or by e-mail.

The legal bases for processing personal data are:

- a) Article 6(1)(a) GDPR i.e. consent of the data subject;
- b) 6(1)(b) GDPR, i.e. the necessity of the processing of personal data for the conclusion and performance of a contract and the necessity to take steps at the request of the data subject before entering into a contract;
- c) Article 6(1)(c) of the GDPR, i.e. legal obligation - where an invoice or other accounting document is issued and kept in the accounting records and where recruitment is carried out;
- d) Article 6(1)(f) of the GDPR, i.e. the Controller's legitimate interest in being able to establish, assert and defend against claims;
- a) Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest in organizing and carrying out promotional programs organized by the Controller.

#### **4. Recipients of personal data**

Personal data may be made available to entities authorized on the basis of generally applicable laws, in particular to institutions entitled to control the Controller's activity or institutions authorized to obtain personal data on the basis of legal regulations, as well as entities providing the Controller with services in the field of outsourcing of accounting processes, auditors, legal or tax advisors, and IT service providers.

Only those persons for whom there is justification for such access due to the tasks performed and services provided have access to personal data. All persons authorized to process personal data are obliged to maintain the confidentiality of the data and protect it from disclosure to unauthorized persons.

The Controller may disclose personal data processed by it for the purposes described in this privacy policy to other subsidiaries of the Controller. The disclosure shall only take place for internal management purposes (e.g. for accounting purposes, for centralized customer management, etc.).

## **5. Data retention period**

Your personal data will be stored for:

- the period of performance of the contracts and, after their expiry, until the expiry of the limitation period for any claims; or
- for the period laid down by the applicable law; or
- the duration of the Controller's promotional programs; or
- in the case of data processing for marketing purposes, until you withdraw your consent; or
- for the duration of the recruitment process - if you have given your consent to the processing of your personal data in future recruitment processes, your data will be processed until you withdraw your consent, but no longer than one year.

If a person makes a claim, the period of storage and processing of his or her personal data may be extended if this is necessary for the investigation of the claim and any defense against such claim.

## **6. Rules on the collection of personal data**

The provision of personal data is voluntary but necessary for: the conclusion and execution of the contract, participation in promotional programs, and participation in the recruitment process.

## **7. Source of data**

The source of the personal data of the contractors' representatives is the Controller's contractors.

## **8. Rights in relation to the processing of personal data**

The data subject may exercise the following rights:

1. The right to request access to their personal data, as well as to receive a copy thereof,
2. the right to rectify their personal data,
3. the right to the erasure of your personal data,
4. the right to restrict the processing of personal data,

5. the right to object to the processing of personal data - it is necessary to indicate the specific situation which, in your opinion, justifies the cessation of processing,
6. the right to data portability - if the Controller has obtained personal data on the basis of your consent or a contract,
7. the right to withdraw consent to the processing of personal data for a specific purpose - insofar as the processing of your personal data is based on consent,
8. the right to lodge a complaint to a supervisory authority in relation to the processing of personal data by the Controller - the supervisory authority is the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw.

## **9. Security**

The controller takes appropriate technical and organizational measures to protect your personal data. Your personal data is only accessible to persons who need it for the purposes and tasks described in this privacy policy (e.g. HR staff, and IT system administrators). All these persons are obliged to treat personal data confidentially and only in accordance with the applicable data protection laws and regulations. Data is transmitted to us in unencrypted form, via an open, cross-border network accessible to everyone. However, the Controller has implemented security measures to protect the data from unauthorized access and to ensure the authenticity of the website, the integrity of the data, and the confidentiality of the data transmitted via the group's internal network (Intranet).

## **10. Transfer of personal data to third countries and international organizations**

Personal data may be transferred to third countries outside the European Economic Area ("EEA"). The controller transfers personal data outside the EEA in accordance with the requirements of the GDPR, contained, inter alia, in Article 46 of the GDPR, in particular on the basis of standard contractual clauses.

## **11. Automated decision-making, including profiling**

The Controller does not carry out automated decision-making, including decisions resulting from profiling based on your personal data.

## **12. Contact details**

You can contact the Controller in several ways:

1. by sending an e-mail to: [hello@innovativelabs.io](mailto:hello@innovativelabs.io)
2. via the contact form;
3. by sending a letter to the Controller's registered office address.

The recommended way to get in touch regarding your personal data is by email.

A person who has made a request or demand for the processing of his or her personal data, in the exercise of his or her rights, may be asked to answer a number of questions to verify his or her identity.

## COOKIES

The Controller's websites also use cookies to track the use of the website. Cookies are small data files that a website leaves on your computer, tablet or smartphone when you visit a website. By means of cookies, the website can "remember" certain input data and settings (e.g. login, language, font size and other preferences) for a certain period of time and the user does not have to re-enter these parameters when visiting or using the portal again.

The information collected through cookies is not used to identify you and cookies are only used for the purposes described in this privacy policy. You can block or delete cookies from your web browser. Instructions at: [aboutcookies.org](http://aboutcookies.org). You can delete all cookies on your computer. Most browsers can be set not to accept cookies. However, if this is the case, you may have to manually adjust some settings each time you visit a website, which may result in a degradation of the performance of some functions.

## Analytical tools used by us and our partners

Our Company and our Partners apply various solutions and tools used for analytical purposes. Below you will find basic information about these tools. For detailed information in this regard, please refer to the Privacy Policy of the respective partner.

- Google Analytics

Google Analytics cookies are cookies used by Google to create statistics and reports on the operation of the website, in order to analyze how you use the website. Google does not use the collected data

to identify the user, nor does it combine this information to enable identification. Detailed information about the scope and principles of data collection in connection with this service can be found at the following link: <https://www.google.com/intl/pl/policies/privacy/partners>.

- MailerLite

Mailer Lite cookies are cookies used to send mailings.

Detailed information about the scope and principles of data collection in connection with this service can be found at the following link: <https://www.mailerlite.com/legal/cookie-policy>

### Managing cookie settings

Service cookies, which are necessary for the use of the Controller's website, are automatically installed on the user's device. Their use is necessary for the provision of the telecommunications service (data transmission to display content) - the user does not have the option to opt out of these cookies if he wants to use the website.

Analytical cookies are not automatically installed by the Controller. You may give us permission to install analytical cookies by giving your consent when you open the website.

You may give us permission to install analytical cookies by clicking the "I accept" button on the banner that appears when you access the website. We will then be authorized to install analytical cookies according to the settings of the browser used by the user (in the case of default settings, all cookies are installed).

The user may agree to install only selected analytical cookies. To do this, simply click the "Manage cookies" button on the banner that appears after entering the website and select the cookies that the user wants to agree to install.

The user may withdraw the granted consent at any time. To do so, the User should click on the icon located in the lower left corner and select withdrawal of consent.

Withdrawal of consent for the use of cookies is also possible via browser settings.

In the absence of consent or in the case of withdrawal of consent for a given type and provider of cookies (in the case of non-acceptance of the installation of cookies in accordance with the settings of the browser), the Controller does not install such cookies on the user's terminal device.