

WANDLEE PRIVACY POLICY

This Privacy Policy is drafted for information purposes, and fulfils the information duties imposed on the data controller by GDPR, namely 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.

The terms used in this Privacy Policy shall have the meaning stated below:

Privacy Policy	this document stipulating the rules and methodology for User personal data processing by Wandlee;
Service	website at the address: www.wandlee.com ;
Services	services provided electronically by Wandlee via the Service, in particular including explanations regarding Wandlee system operation;
User	person using the Service and the related functionalities, among others to contact Wandlee and receive replies to one's inquiries;
Wandlee/Service Provider	data controller with registry data stipulated in Clause 1.1. of this Privacy Policy.

1. DATA CONTROLLER

- 1.1. Service Provider, namely Wandlee sp. z o. o. with its registered office in Warsaw, address: 02-001 Warszawa, Al. Jerozolimskie 85 m. 21, entered in the Register of Entrepreneurs of the National Court Register as number KRS: 0000607072, VAT number (NIP): 7010557972, REGON: 363933070, with equity of PLN 5,600, shall act as the Data Controller.
- 1.2. Wandlee can be contacted with respect to personal data in particular by e-mail at email address: team@wandlee.com.
- 1.3. Wandlee has also appointed the Personal Data Inspector to be contacted by writing at the e-mail address: iod@wandlee.com or at the aforementioned postal address of Wandlee.

2. DATA PROCESSING METHODOLOGY

- 2.1. The scope and objective of personal data processing shall be determined by the scope of consents given and completed data, as sent via respective form, or otherwise provided to Wandlee by the User.
- 2.2. Processing of personal data may refer to one's full name, e-mail address, phone number, IP address, Facebook ID, and other data you may voluntarily provide to Wandlee, or to which you may provide Wandlee access.
- 2.3. The nature of services provided by Wandlee prevents anonymity of Users.
- 2.4. User personal data shall be processed for the following purposes:
 - 2.4.1. compliance – the legal basis for processing is formed by a legal obligation to which the controller is subject in order to comply with the law (Article 6(1)(c) GDPR);
 - 2.4.2. rendering Services electronically – the legal basis for processing is formed by legitimate interests pursued by Wandlee (Article 6(1)(f) GDPR) involving proper conduction of

business or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR);

2.4.3.complaint handling and optimisation of Wandlee services - the legal basis for processing is formed by legitimate interests pursued by Wandlee (Article 6(1)(f) GDPR) involving proper conduction of its business;

2.4.4.promotional and commercial activities carried out by Wandlee – the legal basis for processing is formed by legitimate interests pursued by Wandlee (Article 6(1)(f) GDPR) or by a voluntary consent by a data subject (Article 6(1)(a) GDPR);

2.5. Personal data are provided on voluntary basis, yet this is required to use the Services. In some cases, failure to grant consent to personal data processing where such consent is mandatory shall prevent Wandlee from taking specific actions to the extent whereby granting consent permits Wandlee to take such actions.

2.6. If Wandlee becomes informed that the User uses the Services in breach of applicable regulations (prohibited use), Wandlee may process User’s personal data to the extent necessary to determine the degree of one’s accountability.

2.7. Personal data, in particular User personal data, shall be processed for the period:

2.7.1.adequate for Wandlee’s evidencing that it has properly performed its obligations, whereas the period shall end on claims expiry date;

2.7.2.in the event of marketing activities, personal data shall be processed until a data subject objects against further processing of one’s personal data for marketing purposes, or withdraws the consent to send messages with such contents.

2.8. After the aforementioned period, personal data shall be erased unless their processing is required on other legal grounds.

2.9. Wandlee shall not transfer personal data outside the territory of the European Union.

3. RECIPIENTS OF THE DATA

3.1. Wandlee may outsource personal data processing to third parties for the purpose of servicing the User and to cooperate with other entities. In such cases, recipients of the data may include: hosting provider, external servers, namely Microsoft Azure, telecommunications provider, e-mail operator, invoice management system provider, accountancy, insurer, and legal office.

3.2. Personal data gathered by Wandlee may also be provided to: relevant governmental authorities on request, pursuant to applicable legal regulations, or other persons and entities in cases envisaged by the law.

3.3. Any entity to whom Wandlee outsources personal data processing pursuant to data processing agreement (hereinafter “Processing Agreement”) shall guarantee appropriate security and confidentiality of personal data processing. The entity processing User personal data pursuant to the Processing Agreement may process User’s personal data via another entity exclusively under a prior consent from Wandlee.

3.4. Disclosure of personal data to unauthorised entities under this Privacy Policy may only occur with a prior consent of a data subject.

4. RIGHTS OF THE DATA SUBJECT

4.1. Each and every User shall have the right to: (a) have one’s gathered personal data erased both from the system owned by Wandlee, and from databases of the Service Provider’s existing or prior collaborates, (b) restrict data processing, (c) portability of personal data gathered by Wandlee about the User, including to obtain such data in a structured form, (d) to request access to one’s personal data from Wandlee and to rectify such data, (e) object

against processing, (f) withdraw consent granted to Wandlee at any time, without affecting the legality of processing under such a consent before the withdrawal; (g) submit a complaint against Wandlee to a supervisory authority (President of the Personal Data Protection Office).

5. OTHER DATA

5.1. Wandlee may store http inquiries and, therefore, server log files may include some information, including IP address of a computer from which the inquiry has been received, User's station name – identification via http protocol, if possible, systemic date and time of registration at the Service website and receipt of inquiry, number of bites sent by the server, URL address of the website previously visited by the User, if a link was used, information about User's browser, information about errors upon http transaction, information about User's device, and mobile equipment identifiers. The logs may be gathered for correct Service administration purposes. Access to such information is only provided to persons authorised to administer the IT system. Log files may be analysed for the purpose of traffic statistics on the Service website and errors occurring. The summary of such information shall not provide for User identification.

6. SECURITY

6.1. The Service Provider shall implement appropriate technical and organisational measures to ensure a level of personal data security appropriate to the risk and data categories subject to protection, in particular assuring technical and organisational measures to secure the data against unauthorised disclosure, unauthorised removal, processing in breach of the law, as well as accidental or unlawful destruction, loss, or alteration. The User personal data set shall be stored at a secured server, and the data shall also be protected by Wandlee's internal procedures on personal data processing and information security policy.

6.2. Wandlee has also implemented appropriate technical and organisational measures, such as pseudonymisation, designed for the purpose of effective implementation of data protection rules, such as data minimisation, and for the purpose of assuring necessary security in order to meet the requirements under GDPR and to protect the rights of data subjects. The Service Provider shall implement all the necessary technical measures stipulated in Articles 25, 30, 32-34, and 35-39 GDPR to assure increased protection and security of User personal data processing.

6.3. At the same time, Wandlee points out that using the Internet and services rendered electronically may pose a risk of malware permeating to the telecommunications system and User devices, as well as of unauthorised access to User data, including personal data, by third parties. In order to mitigate such risks, the User should apply appropriate technical security measures, including the use of current anti-virus software, or software protecting User ID in the Internet. In order to obtain detailed and professional information regarding Internet security, Wandlee recommends to obtain such information from entities specialising in such IT services.

7. COOKIES AND USER ID

7.1. Wandlee uses Cookies technology to assure correct operation of the Service. Cookies are the data packets saved on User device via the Service, which usually contain information conforming with the file purpose, used by the User when using the Service, which include: service address, placement date, expiry date, unique number, and additional information in line with the file purpose.

- 7.2. The Service uses two types of Cookies: (a) session cookies, to be permanently erased upon the end of User's browser session; (b) persistent cookies, which are saved after the end of browser session at the User's device, until deleted.
- 7.3. Cookies, both of the session and persistent type, do not permit User identification. The Cookies mechanism does not allow downloading any personal data.
- 7.4. The Service Cookies are safe to the User's device and, in particular, do not permit virus or other malware spreading onto the User's device.
- 7.5. Files generated directly by Wandlee cannot be read by other services. External Cookies (namely Cookies placed by Wandlee's collaborates) can be read by an external server.
- 7.6. The User may individually change the browser settings regarding Cookies at any time, determining the terms for their storage, as well as service configuration settings.
- 7.7. Principally, the User may disable Cookies saving on one's device, according to the browser producer's manual, but this may result in unavailability of Service functions in whole or in part.
- 7.8. The User may also individually delete the Cookies saved on one's device at any time, according to the browser producer's manual.
- 7.9. The Service Provider shall use own Cookies for the following purposes: configuration of Wandlee Service and adaptation of website content to User preferences or behaviour; audience measurement analysis, click counter and paths taken to improve the appearance and content organisation on the website, time spent on the website, as well as number of visitors and frequency of visits.

7.10. The Service Provider shall use External Cookies for the following purposes:

Cookies of:	Purpose of saving:
Google Analytics	gathering general or anonymous statistical data via analytical tools
Google Adwords	promotional and marketing activities within the framework of retargeting process
Apple Search Ads	promotional and marketing activities within the framework of retargeting process at Apple AppStore
Facebook Ads	promotional and marketing activities within the framework of retargeting process

7.11. Detailed information about Cookies handling are available at the Internet browser settings, as used by the User.

8. FINAL PROVISIONS

8.1. This Privacy Policy shall enter into force on 20 May 2018.