

PRIVACY POLICY OF WANDLEE

This Privacy Policy is informative in nature and fulfills the information obligations imposed on the data controller by the GDPR, i.e., Regulation 2016/679 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.

The terms used in this Privacy Policy have the following meanings:

Privacy Policy	this document describing the principles and method of processing Users' personal data by Wandlee
Service	an internet service available at www.wandlee.com , www.jobcall.ai , https://app.jobcall.ai/
Services	services provided electronically by Wandlee through the Service, consisting in particular of providing explanations regarding the operation of the Wandlee system, providing access to the internet application app.jobcall.ai, and for marketing purposes, if separate consent has been given
User	a person using the Service and related functionalities, in particular for contacting Wandlee and receiving responses to their inquiries
Wandlee/Service Provider	the data controller of personal data with registration data specified in clause 1.1. of the Privacy Policy

1. PERSONAL DATA CONTROLLER

- 1.1. The data controller of Users' personal data is the Service Provider, i.e., Wandlee sp. z o.o. with its registered office in Warsaw (02-001), Al. Jerozolimskie 85, apt. 21, entered in the National Court Register under KRS number: 0000607072, Tax Identification Number (NIP): 7010557972, National Business Registry Number (REGON): 363933070, with share capital of 6,832 PLN.
- 1.2. Contact with Wandlee regarding personal data can be made, in particular, via email at team@wandlee.com, team@jobcall.com
- 1.3. Wandlee has also appointed a Data Protection Officer, who can be contacted by writing to the email address iod@wandlee.com or to the above-mentioned address of Wandlee's registered office.

2. DATA PROCESSING METHOD

- 2.1. The purpose and scope of processing personal data are determined by the scope of consents and completed data submitted via the appropriate form or provided to Wandlee by the User in another way..
- 2.2. The processing of personal data may include names, email addresses, phone numbers, IP addresses, and other data voluntarily provided to or made accessible to Wandlee by the User.
- 2.3. The nature of the services provided by Wandlee precludes their anonymous provision.
- 2.4. User's personal data will be processed for the following purposes:
- 2.5. Dane osobowe Użytkowników będą przetwarzane w następujących celach:
 - 2.5.1. compliance with legal regulations - the legal basis for processing is the statutory authorization to process data necessary for lawful operation (Art. 6(1)(c) of the GDPR);
 - 2.5.2. provision of services electronically – the legal basis for processing is the legitimate interest pursued by Wandlee (Art. 6(1)(f) of the GDPR) consisting in the proper conduct of business activities or when necessary for taking actions prior to entering into a contract at the request of the data subject (Art. 6(1)(b) of the GDPR);

- 2.5.3. handling complaints and optimization of Wandlee's services - the legal basis for processing is the legitimate interest pursued by Wandlee (Art. 6(1)(f) of the GDPR) consisting in the proper conduct of business activities;
- 2.5.4. conducting promotional and commercial activities by Wandlee – the legal basis for processing is the legitimate interest pursued by Wandlee (Art. 6(1)(f) of the GDPR) or the voluntary consent of the data subject (Art. 6(1)(a) of the GDPR).
- 2.6. Providing personal data is voluntary, but necessary to use the Services. In some cases, failure to consent to the processing of personal data when it is mandatory will prevent Wandlee from taking certain actions within the scope to which consent allows Wandlee to take such actions.
- 2.7. In the event that Wandlee becomes aware of the User's use of the Services in violation of applicable regulations (unlawful use), Wandlee may process the User's personal data to the extent necessary to determine the extent of their liability.
- 2.8. Personal data, especially User's personal data, will be processed for the period:
 - 2.8.1. appropriate for demonstrating Wandlee's proper fulfillment of its obligations, with this time corresponding to the statute of limitations period for claims;
 - 2.8.2. and in the case of marketing activities, personal data will be processed until the data subject objects to further processing of their personal data for marketing purposes or withdraws consent to receive messages of such content.
- 2.9. After the above-mentioned period, personal data will be deleted unless their processing is necessary on another legal basis.
- 2.10. Wandlee does not transfer personal data outside the European Union.

3. DATA RECIPIENTS

- 3.1. Wandlee may entrust the processing of personal data to third parties to handle User support and collaborate with other entities. In such cases, the recipients of the data may include: hosting providers, text and voice processing service providers, telephone call service providers, email service operators, invoice management system providers, accounting firms, insurers, legal offices.
- 3.2. Personal data collected by Wandlee may also be disclosed to: appropriate state authorities at their request under relevant legal regulations or other individuals and entities – in cases provided for by legal regulations.
- 3.3. Each entity to which Wandlee entrusts the processing of personal data, based on a data processing agreement (hereinafter "Data Processing Agreement"), guarantees an adequate level of security and confidentiality of personal data processing. The entity processing User's personal data based on the Data Processing Agreement may process User's personal data through another entity only with prior consent from Wandlee.
- 3.4. Disclosure of personal data to unauthorized entities under this Privacy Policy may only occur with the prior consent of the data subject.

4. DATA SUBJECT RIGHTS

- 4.1. Every User has the right to: (a) delete personal data collected about them from both Wandlee's system and the databases of entities with which the Service Provider cooperates or has cooperated, (b) restrict the processing of data, (c) data portability, including the receipt of data in a structured format, (d) request access to and correction of their personal data by Wandlee, (e) object to processing, (f) withdraw consent from Wandlee at any time without affecting the lawfulness of processing based on consent before its withdrawal, and (g) lodge a complaint with the supervisory authority (President of the Office for Personal Data Protection).

5. OTHER DATA

- 5.1. Wandlee may store HTTP queries, and therefore server log files may contain certain information, including the IP address of the computer from which the query originated, the name of the User's station – identification by the http protocol, if possible, the date and time

of system registration on the Service website and the arrival of the query, the number of bytes sent by the server, the URL address of the page previously visited by the User if accessed through a link, information about the User's browser, information about errors that occurred during the http transaction, information about the User's device, and mobile device identifiers. Logs may be collected for proper administration of the Service. Only authorized persons have access to the information. Log files may be analyzed to generate traffic statistics on the Service website and identify errors. Summarizing such information does not identify the User.

6. SECURITY

- 6.1. The Service Provider employs technical and organizational measures to ensure the protection of processed personal data appropriate to the threats and categories of data protected, particularly securing data technically and organizationally against unauthorized access, taking over by an unauthorized person, processing in violation of the law, and change, loss, damage, or destruction. The collection of User's personal data is stored on a secured server, and internal Wandlee procedures regarding the processing of personal data and information security policies also protect the data.
- 6.2. Wandlee has also implemented appropriate technical and organizational measures, such as pseudonymization, designed to effectively implement data protection principles, such as data minimization, and to provide processing with the necessary safeguards to meet the requirements of the GDPR and protect the rights of the individuals whose data are concerned. The Service Provider implements all necessary technical measures specified in Articles 25, 30, 32-34, 35-39 of the GDPR to ensure increased protection and security of User's personal data processing.
- 6.3. At the same time, Wandlee indicates that the use of the Internet and services provided electronically may be threatened by the intrusion of harmful software (malware) into the User's teleinformatics system and device, as well as unauthorized access to the User's data, including personal data, by third parties. To minimize these threats, the User should use appropriate technical security measures, e.g., using up-to-date antivirus programs or protecting User's identification on the Internet. For detailed and professional information regarding safety behavior on the Internet, Wandlee recommends consulting entities specializing in such IT services.

7. COOKIES AND USER IDENTIFIERS

- 7.1. To ensure the proper functioning of the Service, Wandlee uses cookie technology. Cookies are packets of information stored on the User's device through the Service, usually containing information consistent with the purpose of the file, by which the User uses the Service – typically: the address of the service, the date of placement, the expiration date, a unique number, and additional information consistent with the purpose of the file.
- 7.2. The Service uses two types of cookies: (a) session cookies, which are permanently deleted with the end of the User's browser session; (b) persistent cookies, which remain on the User's device after the end of the browser session until they are deleted.
- 7.3. Based on cookies, both session and persistent, the User's identity cannot be determined. The cookie mechanism does not allow for the collection of any personal data.
- 7.4. Service cookies are safe for the User's device, especially as they do not allow viruses or other software to enter the device.
- 7.5. Files generated directly by Wandlee cannot be read by other services. External cookies (i.e., cookies placed by entities cooperating with Wandlee) may be read by an external server.
- 7.6. The User can independently change cookie settings at any time by specifying the conditions for their storage through the internet browser settings or through the configuration of the service.
- 7.7. Above all, the User can disable the storage of cookies on their device according to the manufacturer's instructions for the browser, but this may result in the unavailability of some or all of the Service's functions.
- 7.8. The User can also independently delete cookies stored on their device at any time according to the manufacturer's instructions for the browser.

7.9. The Service Provider uses its own cookies for the following purposes: configuring the Wandlee Service and customizing page content to User preferences or behavior; analyzing and examining traffic, the number of clicks, and User navigation paths on the site to improve the appearance and organization of content on the site, time spent on the site

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

Tool's Cookies:	Purpose of Storage:
Google Analytics	Collecting general or anonymous statistical data through analytical tools
Google Adwords	Promotional and marketing activities in retargeting processes
Facebook Ads	Promotional and marketing activities in retargeting processes

7.11. Detailed information on Cookie handling is available in the settings of the internet browser used by the User.

8. FINAL PROVISIONS

8.1. This Privacy Policy enters into force on May 16, 2023.