

This information clause refers to the following regulations regarding personal data protection:

- Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of individuals concerning the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR) (Official Journal of the EU, L 119, page 1), referred to as "GDPR" (applied from 25.05.2018, along with new national regulations)

## **Principles of Personal Data Processing**

Below are the most important principles we follow:

- We collect personal data only in the minimum scope necessary to achieve the purposes for which it is collected.
- The purposes for collecting personal data of Users are clearly defined, based on legal provisions – we do not process data in a way that is inconsistent with these purposes. We process it for the execution of contracts (GDPR Article 6, paragraph 1, letter b); to fulfill legal obligations of the Administrator (GDPR Article 6, paragraph 1, letter c); based on prior consent in the scope and purpose defined in the consent text (GDPR Article 6, paragraph 1, letter a); for legitimate interests pursued by the Administrator (GDPR Article 6, paragraph 1, letter f)
- We ensure the accuracy and correctness of Users' personal data and respond promptly (no later than 30 days) to any requests for correction or updating of data. This period may be extended for a further 60 days due to the complex nature of the request or the number of requests, in which case we will inform you.
- We implement Users' rights to access their personal data and to correct it.
- We also fulfill Users' rights to delete personal data, withdraw consent, limit processing, data portability, and the right to object to data processing, as well as the right not to be subject to decisions based solely on automated data processing, including profiling.
- We limit the storage of personal data according to legal provisions, only for the period necessary to achieve the purposes for which they are collected, unless events occur that could extend the storage period.
- We protect Users' personal data from loss, unauthorized access, accidental loss or change, and other illegal forms of processing.
- If personal data is shared with other entities, this is done securely, contractually protected, and in compliance with applicable law.
- Data will be processed for the period during which a user account is registered in the system, the period resulting from our legal obligations, or, if processed based on consent – until the consent is revoked.
- Personal data may be transferred to processors with whom we cooperate to provide our services, e.g., companies providing IT systems, companies providing services necessary for the operation of the system or application.
- Personal data may be transferred to international organizations and third countries.

## **User Rights**

The User has the right to:

- Withdraw consent for the processing of personal data at any time.

- The right to access data: the right to receive confirmation of whether personal data is being processed and how.
- The right to correct outdated or inaccurate personal data, as well as the right to complete it if it is incomplete.
- The right to object to the processing of personal data if we process personal data based on our legitimate interest (e.g., analytical, evidential, archival purposes). In the case of such an objection, we must cease processing unless we demonstrate the existence of significant, justified grounds for processing that override the inconvenience or are related to the defense of our claims (e.g., in legal proceedings). The right to object also applies when processing concerns direct marketing, including profiling based on our legitimate interest, such as profiling based on cookies. In this case, data processing for this purpose must be stopped immediately.
- The right to erase personal data ("right to be forgotten"), which generally means requesting the administrator to promptly delete their personal data.
- The right to restrict the processing of personal data, which may practically involve temporarily blocking user access to data or transferring data to another system.
- The right to data portability: the right to receive a copy of personal data if processing is based on consent or contract and is automated.
- The right to lodge a complaint with the supervisory authority – the President of the Personal Data Protection Office.

Any requests regarding personal data, including rights, can be sent by email to: [office@digitalshelf.pl](mailto:office@digitalshelf.pl) or by post to: Digital Shelf Sp. z o.o., ul. Aleksandra Gieysztora 2/52, 02-999 Warsaw.

Requests will be fulfilled without undue delay, no later than within 30 days of receiving them. This period may be extended by an additional 60 days due to the complex nature of the request or the number of requests, and we will inform you about it. Until the request is fulfilled, information may be sent that was opted out of after withdrawing consent.

### **Consent – Withdrawal of Consent**

In the relationship with the User, including services provided through the application, the User may be asked to consent to the processing of personal data for marketing purposes, including electronic marketing, if consent is the legal basis for processing personal data. We do not require consent when it is not necessary for a specific case (although the obligation to obtain consent may result from other legal provisions, e.g., consent for telephone or electronic marketing).

The User has the right to withdraw consent by contacting the Administrator.

Withdrawing consent does not involve any negative consequences or inconveniences – however, please be aware that its withdrawal may result in the inability to use services for which, under the law, we are required to obtain consent.

The withdrawal of consent does not affect the lawfulness of data processing carried out based on consent before its withdrawal.

### **Data Storage**

The Administrator stores personal data for the period necessary to achieve the purposes the User was informed about. The period for storing personal data is determined in strict accordance with applicable laws. The User has the right to obtain information about the probable duration of personal data storage.

### **Sharing Data with Other Entities**

With the User's consent, depending on the purpose of data processing, and the content of consent for processing and sharing, personal data may be shared with other entities.

### **Profiling**

We may carry out profiling as part of processing personal data.

### **Changes**

The Administrator reserves the right to make changes to this document, which may result from the need to adapt to changes in legal regulations or applicable privacy standards, or from expanding our offer.