

DEFINITIONS

Administrator: thecodest.co domain, belonging to Codest Ltd., Office 303b, 182 -184, High Street North, E6 2JA London, United Kingdom. Company No. 12590542, VAT number: GB363431020.

Personal data: any information on an identified or possible to be identified natural person by one or a few special aspects defining the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person, including the IP No. of the device, data on the location, Internet identifier and information gathered via cookie files and another similar technology.

Policy: this Privacy Policy.

RODO: the Regulation of the European Parliament and of the Council (EU) 2016/679 of 07 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.

Website: the on-line website and mobile applications broadcast by the Administrator, which this Policy shall be applied to.

User: any natural person visiting the Website or using one or more services or functionalities rendered available at the Website.

DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

In connection with the use of the Website by the User, the Administrator shall gather data in the scope necessary for rendering particular services offered at the Website as well as the information on the User's activity at the Website. Detailed principles and objectives of processing of personal data gathered during the User's use of the Website are described below.

OBJECTIVES AND LEGAL GROUNDS FOR DATA PROCESSING AT THE WEBSITE

Use of the Website

Personal data of all persons using the Website (including the IP address or other identifiers and information gathered via cookies files or other similar technologies) and not being the registered Users (i.e. persons who do not have an account or a profile at the Website) shall be processed by the Administrator:

- for the purpose of rendering electronic services in the scope of giving access to the content of the Website to the Users – the necessity of processing in order to perform the agreement constitutes the legal grounds for processing (Article 6 section 1 letter b) of RODO),
- for analytical and statistical purposes – the Administrator's substantiated interest, consisting in the performance of analyses of the Users' activity and their preferences,

for the purpose of correction of functionalities applied and services rendered, shall constitute the legal basis for processing (Article 6 section 1 letter f) of RODO);

- for the purpose of possible determination, seeking or defending claims – the Administrator's substantiated interest, consisting in defending its rights, shall constitute the legal basis for processing (Article 6 section 1 letter f);
- The Controller may also use cookies for marketing purposes, including sending behavioural advertisements to the Users. To this end, the Controller may store information and access information which is already stored in a telecommunications end device of the User (computer, telephone, tablet, etc.). *The Controller may also use re-targeting and re-marketing tags which recognise and give information to different third party cookies. These tags personalise User experience and the advertisements displayed to User based off User activity across any other websites using the same tags.* The use of cookies and personal information collected by means of cookies for marketing purposes, especially as far as promotion of third-party services and products is concerned, requires the User's consent. The consent may be withdrawn at any time. The legal grounds for processing Personal Data shall be the Controller's legitimate interest (Article 6(1)(f) of the GDPR), in connection with the User's consent.

The User's activity at the Website, including their personal data, shall be registered in system logs (a special computer programme used for storing chronological records, containing information on events and actions relating to the IT system used for rendering services by the Administrator). Information gathered in logs shall be processed mainly for purposes connected with rendering services. The Administrator also processes the data for technical, administrative purposes, for purposes of ensuring the security of the IT system and the IT system management, as well as for analytical and statistical purposes – the Administrator's substantiated interest shall constitute the legal basis for processing in this respect (Article 6, section 1, letter f) of RODO).

Contact Forms

The Administrator shall ensure the possibility of contacting the Administrator with the use of electronic contact forms. The use of the form shall require providing personal data necessary to contact the User and to provide the response to the inquiry. The User may also provide other data in order to facilitate contact or handle the inquiry. The provision of data marked as obligatory shall be required to accept and handle the inquiry and the failure to provide thereof shall result in the lack of possibility of handling the inquiry. Provision of the remaining data is voluntary.

Personal data are processed:

- in order to identify the sender and handle the inquiry sent via the form – the necessity to process in order to perform the services agreement shall constitute the legal grounds for processing (Article 6, section 1, letter b) of RODO);

- for analytical and statistical purposes – the substantiated interest of the Administrator, consisting in keeping the statistics of inquiries submitted by Users via the Website, in order to improve the functionalities thereof, shall constitute the legal basis for processing (Article 6 section 1 letter f) of RODO);

CHATBOT

The Administrator shall provide free of charge to Users the opportunity to use a Chatbot. The use of the Chatbot shall require providing personal data necessary to contact the User and to provide the response to the inquiry. The User may also provide other data in order to facilitate contact or handle the inquiry. Provision of the data is voluntary, but the failure to provide thereof shall result in the lack of possibility of handling the inquiry.

Personal data are processed:

- in order to identify the sender and handle the inquiry sent via Chatbot – the necessity to process in order to perform the services agreement shall constitute the legal grounds for processing (Article 6, section 1, letter b) of RODO);
- for analytical and statistical purposes – the substantiated interest of the Administrator, consisting in keeping the statistics of inquiries submitted by Users via the Website, in order to improve the functionalities thereof, shall constitute the legal basis for processing (Article 6 section 1 letter f) of RODO);

MARKETING

The Administrator shall process the Users' personal data for the purpose of implementing marketing actions which may consist in:

- sending e-mail notifications on interesting offers or contents, which in some cases contain commercial information (newsletter service),

Newsletter

The Administrator renders the newsletter service to persons who provided their e-mail address for that purpose. Provision of data shall be required for the purpose of rendering the newsletter service and the failure to provide thereof shall result in the lack of possibility of sending thereof.

Personal data shall be processed:

- for the purpose of rendering the newsletter sending service – the necessity of processing to perform the agreement shall constitute the legal grounds for processing (Article 6, section 1, letter b) of RODO);
- in case of sending marketing contents within the framework of the newsletter to the User – the Administrator's substantiated interest shall constitute the legal basis for processing, including profiling (Article 6, section 1, letter f) of RODO), in connection with the consent expressed for receiving the newsletter;
- for analytical and statistical purposes – the Administrator's substantiated interest, consisting in performance of analyses of the Users' activity at the Website, for the

purpose of improvement of functionalities applied, shall constitute the legal basis for processing (Article 6 section 1 letter f) of RODO);

- for the purpose of possible determination, seeking or defending claims – the Administrator’s substantiated interest shall constitute the legal basis for processing (Article 6 section 1 letter f);

SOCIAL MEDIA

The Administrator shall process personal data of Users visiting the Administrator’s profiles run in social media (Facebook, LinkedIn, Twitter). The data shall be processed only in connection with keeping the profile, including for the purpose of informing the Users about the Administrator’s activity and promoting events, services and products of various kinds. The Administrator’s substantiated interest consisting in the promotion of its own brand shall constitute the legal basis for personal data processing by the Administrator (Article 6, section 1, letter f) of RODO).

RECRUITMENT

The Administrator processes personal data of Users who participate in the recruitment proces.

Personal data shall be processed:

- performance of obligations provided for by law, relating to the employment process, first of all under the Labor Code – according to Article 6.1.c of GDPR in connection with Labor Code provisions;
- running the recruitment process with regard to data not required by law and also for the needs of recruitment in the future – according to Article 6.1.a of GDPR in connection with Labor Code provisions;
- finding or pursuing claims, if any, or defending against such claims – according to Article 6.1.f of GDPR in connection with the Labor Code.

COOKIE FILES AND SIMILAR TECHNOLOGY

Cookie files are small text files, installed at the device of the User viewing the Website. Cookies usually contain the name of the website domain which they come from, the time of storage thereof at the user’s device and the unique number. In this Policy information pertaining to cookies applies also to similar technologies used within the framework of the Website.

“Service” cookies

The Administrator shall use the so-called service cookies mainly for the purpose of providing the User with services rendered in an electronic manner and for the purpose of the services’ quality improvement. Therefore, the Administrator and other entities rendering analytical and statistical services thereto use cookie files, storing the information or obtaining the access to information already stored in the User’s telecommunications device (computer, telephone, tablet etc.). Cookies used for that purpose comprise:

- cookies with the data introduced by the User (session identifier) for the session duration (user input cookies);
- authentication cookies used for services which require authentication for the duration of the session;•cookies used for assuring security e.g. used for detecting abuse as regards authentication (user centric security cookies);
- multimedia player session cookies (e.g. flash player cookies) for the duration of the session;•user interface customization cookies, for the duration of the session or slightly longer,
- cookies used for monitoring of traffic at the website i.e. data analytics, including:– Google Analytics cookies (i.e. cookies used by the Google company – i.e. the entity which the Administrator entrusted with personal data processing – for the purpose of performing the analysis of the manner of using the Website by the User, including preparation of statistics and reports concerning the Website functioning).

“Marketing” cookies

The Controller may also use cookies for marketing purposes, including sending behavioural advertisements to the Users. To this end, the Controller may store information and access information which is already stored in a telecommunications end device of the User (computer, telephone, tablet, etc.). The Controller may also use re-targeting and re-marketing tags which recognise and give information to different third party cookies. These tags personalise User experience and the advertisements displayed to User based off User activity across any other websites using the same tags. The use of cookies and personal information collected by means of cookies for marketing purposes, especially as far as promotion of third-party services and products is concerned, requires the User’s consent. The consent may be withdrawn at any time. The legal grounds for processing Personal Data shall be the Controller’s legitimate interest (Article 6(1)(f) of the GDPR), in connection with the User’s consent.

More information about cookies

In many cases software used for browsing web pages (web browser) accepts the storage cookies on the User’s end device by default. The Website Users may at any time change the cookie settings. In particular, the settings can be changed so that the automatic use of cookies is blocked or the User is notified of each individual case of placing a cookie file on the Website User’s device. Detailed information on the possibilities and manners of using cookies is available in the software (web browser) settings. Failure to change the cookie settings means that cookies will be placed on the User’s end device and thus the Controller will store and access information about the User’s end device.

Third party cookies

The Administrator uses the following third party cookies:

- provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA under services:
 - **Google Analytics** - to create and maintain statistics about the Website. Google Analytics automatically collects information about the User's use of

the Website in order to analyse the User's actions and behaviour. These cookies are used to store information, such as which page the User came from on the Website. These cookies help to improve the Website.

- **Google Search Console** – for statistical purposes, including: Website positioning, traffic monitoring, error monitoring, and optimizing of Website for positioning.
- **Google Adwords** - in order to display advertisements on other websites which User visited. This data is collected on all sites where User have allowed cookies to be used (including Website), as well as from ads User clicked on.

More information is available at: <https://policies.google.com/privacy?hl=pl>.

- **HubSpot** provided by HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA - to analyse User behaviour on the Website and optimise the Website. More information is available at: <https://legal.hubspot.com/privacy-policy>.
- **HotJar** tool provided by Hotjar Limited, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta - to analyse User behaviour on the Website and optimise the Website. More information is available at: <https://www.hotjar.com/legal/policies/privacy>.
- **Leadforencis** provided by Lead Forensics Ltd, Communication House, 26 York Street, Londyn, W1U 6PZ, Wielka Brytania - to identify companies visiting our sites based on their corporate IP addresses. More information is available at: <https://www.leadforensics.com/software-data-compliance/>.
- **Facebook Ads** provided by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA - in order to implement advertising campaigns, including remarketing. More information is available at: <https://www.facebook.com/privacy/explanation>.
- **LinkedIn Ads** provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA - in order to implement advertising campaigns, including remarketing. More information is available at: <http://www.linkedin.com/legal/privacy-policy>.
- **Twitter Ads** provided by Twitter Inc., Folsom St., Suite 600, San Francisco, CA 94107, USA - in order to implement advertising campaigns, including remarketing. More information is available at: www.twitter.com/privacy.

Social Media Tools. Website uses plugins and other social tools provided by social networking sites such as Facebook, LinkedIn or Twitter. When User view Website, User's browser will establish a direct connection to the servers of the social network administrators (service providers). Through this integration the service providers receive information that

User have viewed Website. This information (including User's IP address) is sent by User's browser directly to the server of the respective service provider (some servers are located in the USA) and stored there. If User is logged in to one of the social networks, the provider will be able to directly associate User's visit to Website with User's profile on that social network.

More information is available at:

Facebook - https://www.facebook.com/legal/FB_Work_Privacy,

LinkedIn - <https://www.linkedin.com/legal/privacy-policy>,

Twitter - <https://twitter.com/privacy>.

PERSONAL DATA PROCESSING PERIOD

The period of data processing by the Administrator depends on the kind of the service rendered and the objective of processing. In principle, data are processed within the time of the service provision or order implementation by the time of withdrawal of the consent expressed or raising an effective objection against data processing in cases when the Administrator's substantiated interest constitutes the legal basis for data processing.

In case of recruitment personal data will be processed for the duration of the continuous recruitment process, not longer than 6 months. In case of giving the consent for the purposes of future recruitment, the data will be processed for the period of 3 years, however, no longer than until the time of withdrawal of the consent for data processing.

Data processing period may be extended in case if processing is necessary to determine, seek or defend against possible claims and after that period only in case and in the scope in which this is required under legal regulations. Upon the lapse of the processing period, data are irrevocably removed or anonymized.

USER RIGHTS

The User shall have the right of access to data contents and to request the correction, removal, limitation of processing thereof, the right of transfer the data and the right of raising an objection against data processing as well as the right of filing a complaint to the supervision authority competent for personal data protection. To the extent to which the User's data are processed under the consent, the consent may be withdrawn at any moment, by means of contacting the Administrator.

Right of objection

At any moment the User shall have the right to raise an objection against processing of their data for direct marketing purposes, including profiling, if the processing takes place in connection with the Administrator's substantiated interest.

The User shall also have the right, at any moment, to raise an objection against the processing of their data for reasons related to their special situation in cases when the Administrator's substantiated interest constitutes the legal basis for processing (e.g. in connection with implementation of analytical and statistical objectives, including profiling).

More information on rights resulting from RODO may be found in personal data processing policy constituting an appendix to this Policy.

DATA RECIPIENTS

In connection with performance of services, personal data shall be disclosed to external entities, including in particular to suppliers responsible for handling IT systems used for rendering services and to entities related to the Administrator, including the companies from its group,

In connection of recruitment, personal data shall be transferred to entities providing services to the Controller related to the recruitment process, suppliers of IT systems and services, entities providing legal services (including tax and debt recovery) or entities providing document archiving services.

In case of obtaining the User's consent, their data may be rendered available also to other entities for their own purposes, including marketing purposes.

The Administrator reserves the right to disclose the information concerning the User to competent authorities or third parties which raise a request for providing such information, based on relevant legal grounds and in accordance with applicable legal regulations.

TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

The level of personal data protection outside the European Economic Area (EEA) differs from the one ensured by the European law. For the aforementioned reason, the Administrator shall transfer personal data outside the EEA only when this is necessary and assuring a relevant level of protection, in particular by means of:

- cooperation with personal data processing entities in countries with respect to which a relevant decision of the European Commission was issued;
- the application of standard contractual clauses issued by the European Commission;
- the application of binding corporate rules approved by a competent supervision body;

The Administrator always informs about the intention of transferring personal data outside the EEA at the stage of collection thereof.

PERSONAL DATA SECURITY

The Administrator carries out, on regular basis, the risk analysis for the purpose of ensuring that the personal data are processed by the Administrator in a secure manner which assures, above all, that only authorized persons have access to the data and only in the scope in which it is necessary due to the tasks performed by them.

The Administrator cares for all the operations with the use of personal data to be registered and made only by authorized employees and colleagues. The Administrator takes up any necessary measures for its subcontractors and other cooperating entities to provide the guarantee of application of relevant security measures in each case of processing personal data at the Administrator's order.

CONTACT DETAILS

Contact with the Administrator is possible via the e-mail address: contact@thecodest.co via

mail to the address: Codest Ltd., Office 303b, 182 -184, High Street North, E6 2JA London, United Kingdom.

The data Administrator appointed the Personal Data Inspector which may be contacted via e-mail address: contact@thecodest.co with respect to any matter concerning personal data protection.

AMENDMENTS TO THE PRIVACY POLICY

The Policy is verified on regular basis and updated if necessary. The current version of the Policy was adopted on and it applies from 23 May 2018.