Privacy Policy

of https://oferer.com/ Website

("Website")

Dear User!

As the controller of your personal data, we respect your privacy and want you to know in what way and on what principles your personal data are processed by us. In our Policy, we specify the most important information in this respect, as well as on the cookies which are used by our Website. This document is adapted to the requirements resulting from the GDPR, i.e. the General Data Protection Regulation.

D PERSONAL DATA CONTROLLER

SIEF-IT Sp. z o.o. [*LLC*] with its registered office in Łódź, [*address:*] ul. Zgierska 73/212, 91-462 Łódź, entered into the Register of Entrepreneurs kept by the District Court Łódź-Śródmieście in Łódź, XX Division of the National Court Register, entry number KRS 0000331633, [*Tax ID/VAT No*] NIP: PL 726-26-09-875, [*National* Official *Business* Register No] REGON: 100689300 with the share capital of PLN 50,000.

Remember that the controller with respect to the personal data of your customers, contractors or employees, which data can be entered by you into our Oferer software, is You – we process these data solely on your behalf, as a processing entity, and exclusively by your order, to be documented (including based on a relevant data processing agreement), and in default of such an order, only where and when we are so obligated by the law.

D PERSONAL DATA

If you intend to use our services (and in particular our software to run a OFERER online store), you will be requested to provide us with your personal details which will be processed by us solely for the purposes as specified below, related to the operation of the Website and provision of the services offered thereon.

Purpose of processing:

- provision of the services offered on the Website
- direct marketing
- sending the newsletter

Basis for data processing:

Depending on the situation, this may include:

- ⇒ a service agreement or actions taken at your request aiming to conclude the same (Article 6 Section 1 Letter b of the GDPR),
- ⇒ the legal obligation incumbent upon us, in particular with respect to accounting in case of payable services (Article 6 Section 1 Letter c of the GDPR),
- ⇒ your consent as expressed on the Website if you decide to express the same (Article 6 Section 1 Letter a of the GDPR),
- ⇒ our legally legitimate interest, consisting in data processing for the following purposes (Article 6 Section 1 Letter f of the GDPR):
 - o establishment, pursuit or defence of any claims,
 - o analytical or statistical purposes,
 - o direct marketing, including profiling,
 - collection of opinions on our software.

Provision of data:

• voluntary, but in some cases necessary to conclude an agreement

Consequence of non-provision of data:

Depending on the purpose for which the data are provided:

- impossibility to use the services of the Website,
- inability to receive information on promotions or special offers, as provided on the Website.

Possibility to withdraw consent:

• at any time

Processing data until your withdrawal of consent remains lawful.

PROFILING

In connection with the Website, we can perform profiling, using the personal data provided by you. This profiling may be performed based on your previous activity. It consists in displaying personalized

ads or making an automatic assessment in what services you may be interested, and presenting you with an offer so matched.

The profiling, as performed by us, does not result in taking decisions producing legal effects for you or affecting you in a similarly significant way.

PROCESSING PERIOD

We will be processing your data only for a period in which we will have a legal basis therefore, it is until:

- ⇒ the legal obligation ceases to be incumbent upon us, which obligates us to process your data (in particular with respect to accounting in case of payable service), or
- ⇒ a possibility ceases to exist to establish, pursue or defend claims related to the agreement, as concluded between us by the Website, or
- \Rightarrow you withdraw your consent to data processing, if it was the basis therefor, or
- ⇒ your objection is accepted to the processing of your personal data in case the basis for the processing of your data was the controller's legitimate interest or the data were processed for the purpose of direct marketing (including profiling)

- depending on which applies in a given case and whichever occurs latest.

DATA SECURITY

While processing your personal data, we apply such organizational and technical means as consistent with the provisions of law, including our application of encrypted connections by means of the SSL certificate.

U YOUR RIGHTS

In addition, you are entitled to demand:

- \Rightarrow access to your personal data,
- \Rightarrow correction of the same,
- \Rightarrow erasure, or
- \Rightarrow restriction of processing,
- \Rightarrow that the data be transferred to another controller.

You have the right, as well, to:

 \Rightarrow lodge at any time **an objection to the processing** of your data:

- for reasons relating to your particular situation to the processing of the personal data concerning you, which is based on Article 6 Section 1 Letter f of the GDPR (i.e. based on legally legitimate interest exercised by the controller), including profiling based on those provisions,
- if the personal data are processed for direct marketing purposes, including profiling, to the extent that the processing is related to such direct marketing.

Contact us if you want to exercise your rights.

If you consider that your data are processed unlawfully, you can lodge a complaint with the supervisory authority.

COOKIES

Our Website like most websites, uses the so-called cookies. These files:

- are saved in the memory of your device (computer, telephone, etc.);
- enable you, among others, to use all functionalities of the Website;
- do not cause any changes in the settings of your device.

Using relevant options of your browser, you can at any time:

- delete the cookies,
- block any use of cookies in the future.

On this Website, cookies are used for the following purposes:

- remembering information on your session,
- statistical,
- marketing,
- making the functionalities of the Website available.

In order to learn how to manage cookies, including the way in which they can be disabled on your browser, you can use your browser's help file. You can familiarize yourself with information on this subject by pressing key F1 on your browser. Besides, relevant tips can be found on the following subpages, depending on the browser you use:

- <u>Firefox</u>
- Chrome
- <u>Safari</u>

• Internet Explorer / Microsoft Edge

More information on cookies can be found in Wikipedia.

OUTSOURCED SERVICES / DATA RECIPIENTS

In connection with our Website, we use services of outside providers to whom your data may be transferred (solely for the purposes specified in this Policy).

Below, find a list of possible recipients of your data:

- Entities providing hosting services to us
- Payment platform providers via which you can pay for our services (Blue Media S.A.)
- Invoicing software providers
- Accounting office
- Entities providing us with tools used for marketing purposes*
- Entities providing us with tools used for analytical purposes*
- Persons cooperating with us based on civil-law agreements, supporting our ongoing activities,
- Internet service providers (in particular Google)*
- Providers of software used for customer and prospective customer service in connection with the Services,
- The Polish Post or courier companies in case of traditional correspondence

TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE EUROPEAN UNION

* Therefore, your personal data may be processed also by entities outside the European Union. The adequate level of your data security, including application of appropriate security measures, is ensured by these entities' participation in the EU-USA Privacy Shield, as established by means of an implementing decision of the European Commission as a collection of rules providing adequate protection of your privacy.

CONTACT DETAILS OF CONTROLLER

You want to exercise your rights regarding personal data?

Or maybe you just want to ask something about our Privacy Policy?

Write to the e-mail address:

info@oferer.com