

Verba-Text Limited Liability Company

PRIVACY POLICY

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I. Introduction – contact details

This Privacy Policy contains general information regarding the use (processing) by Verba-Text Limited Liability Company ("VERBA-TEXT", "we", "us") of the personal data of current and potential customers, including visitors to the VERBA-TEXT website or individual brand websites (hereinafter collectively referred to as "Users").

We respect the privacy of our Users and therefore provide this Privacy Policy so that each User knows the extent to which his/her personal data is processed and can decide independently, consciously and freely whether to use our services.

In this Privacy Policy, we have decided to describe in general terms how and to what extent we collect Users' personal data, for what purposes we use this data, to whom we disclose it and how we protect it. The Privacy Policy also provides Users with information about their rights.

The Policy is general in nature and presents only certain issues selectively. This policy is detailed in the individual terms and conditions of the websites managed on behalf of VERBA-TEXT and in the information clauses that the User will receive when personal data is collected from them in connection with individual services, subscriptions (newsletter), contact forms (quotation, contact request, enquiry), competitions, promotional campaigns, events, etc. The legal basis for all data subjects' rights and the rules governing the processing of their data is the GDPR referred to below.

VERBA-TEXT contact details:

Verba-Text Limited Liability Company

02-793 Warsaw

ul. Belgradzka 4 lok.

13, KRS: 0000339503, NIP: 7010204765, REGON: 14205708500000.

Contact details of VERBA-TEXT's Data Protection Officer (DPO):

Full name: Tomasz Krawczyński

E-mail: biuro@verba-text.pl

Verba-Text Limited Liability Company

02-793 Warsaw, ul. Belgradzka 4 lok.13

KRS: 0000339503, NIP: 7010204765, REGON: 14205708500000.

II. Personal data protection regulations

The VERBA-TEXT Privacy Policy refers to the following provisions on personal data protection:

- the Act of 29 August 1997 on the Protection of Personal Data (Journal of Laws of 2016, item 922) (in force until 25 May 2018)
- 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 (General Data Protection Regulation) (OJ EU L No. 119, p. 1) – otherwise known as "GDPR" (applicable from 25 May 2018 together with new national regulations)

III. Rules for the processing of your personal data

We appreciate the trust placed in us by our Users. When processing Users' personal data, we attach great importance to ensuring that this data is processed in a secure, fair, lawful and transparent manner for the User.

Below are the most important principles we follow:

- We collect personal data only to the minimum extent necessary to achieve the purposes for which it is collected.
- The purposes of collecting Users' personal data are clearly defined and based on legal provisions – we do not process data in a manner inconsistent with these purposes.
- We ensure that Users' personal data is up to date and correct, and we respond without undue delay to any requests to rectify or update data.
- We implement Users' right to access and correct their personal data.
- We also respect Users' rights to have their personal data erased, to withdraw consent, to restrict processing, to data portability, to object to processing, and not to be subject to a decision based solely on automated processing, including profiling.

- We limit the storage of personal data in accordance with the law, only to the period necessary to achieve the purposes for which it is collected, unless there are events that may extend the data storage period.
- We protect Users' personal data against loss, unauthorised access, accidental loss or alteration, and other unlawful forms of processing.
- If personal data is made available to other entities, this is done in a secure manner, contractually secured and in accordance with applicable law.

IV. Users' rights in relation to the processing of personal data

VERBA-TEXT exercises Users' rights related to the processing of their personal data. These rights arise from applicable data protection laws, in particular the GDPR (Articles 16-21).

The User has the right to:

- Withdraw your consent to the processing of personal data at any time.
- Right of access to data: You have the right to receive confirmation from VERBA-TEXT as to whether your personal data is being processed by VERBA-TEXT and, if so, how.
- The right to rectify outdated or inaccurate personal data, as well as the right to supplement it if it is incomplete.
- Right to object to the processing of your personal data: if we process your personal data on the basis of our legitimate interests (e.g. for analytical, evidential or archival purposes), you have the right to object. If you object, we will stop processing your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims (e.g. in court proceedings). The right to object also applies where the processing relates to direct marketing, including profiling based on cookies. In such a case, the processing of personal data for this purpose will be discontinued immediately.
- The right to have personal data deleted by VERBA-TEXT ("right to be forgotten") consists, in principle, of requesting the controller to immediately delete personal data concerning the data subject.
- The right to restrict the processing of personal data, which in practical terms may consist of temporarily blocking users' access to your data or transferring the data to another system.
- Right to data portability: You have the right to receive a copy of the personal data you have provided to us if the processing is based on your consent or on a contract, and is carried out by automated means.
- Right to lodge a complaint with the Polish supervisory authority – the Inspector General for Personal Data Protection (until 25 May 2018) and, thereafter, the President of the Personal Data Protection Office.

All requests regarding the processing of personal data, including your rights, can be sent by email to: biuro@verba-text.pl or in writing to Verba-Text Limited Liability Company, ul. Belgradzka 4 lok. 13, 02-793 Warsaw, Poland with the note "IOD" (DPO). In the case of a request to withdraw consent, see also point VII below.

Your requests will be fulfilled without undue delay, but no later than within one month of receipt. This period may be extended by a further two months due to the complexity of the request or the number of requests, in which case we will inform

you. However, until your request is processed, you may receive information from us that you opted out of by withdrawing your consent.

V. Security of personal data

VERBA-TEXT takes technical and organisational measures to protect personal data against unlawful or unauthorised access or use, as well as against accidental destruction, loss or breach of integrity. The principle of ensuring security has guided us in the design of our IT infrastructure, standards and business practices. Our security procedures include, in particular: access security, backup systems, monitoring, review and maintenance, and security incident management.

As part of ensuring the security of the personal data we process, we undertake to take into account:

- a) confidentiality – we will protect data from accidental disclosure to third parties,
- b) integrity – we will protect data from unauthorised modification,
- c) availability – we will ensure that authorised persons have access to your data if necessary.

Your personal data may be processed by third parties only if such entities undertake to provide appropriate technical and organisational measures to ensure the security of personal data processing and to maintain the confidentiality of such data. Every VERBA-TEXT employee who has access to personal data has the appropriate authorisation and is bound by confidentiality.

VI. How do we process your data?

VERBA-TEXT processes your personal data only for specific, explicit and legitimate purposes. We will not process your data in a manner incompatible with these purposes.

VERBA-TEXT informs the User about the purpose and legal basis for the processing of personal data in each case in a separate communication, e.g. on the website, in writing, etc., to meet its transparency obligations.

Method of data collection

Your personal data may come from many sources, including on the basis of your consent, from our websites, for example via online shops, contact forms, social media and our hotline. In connection with your use of VERBA-TEXT websites, we also collect data contained in system logs (more in section XII).

What data can we process?

The personal data we refer to may include your identification data, e.g. first name, surname, contact details: e.g. telephone number, email address, location data, data relating to your orders, requests and complaints. We will only specify and process the necessary scope of data each time. If you provide us with your contact details, it is sufficient to provide us with your telephone number and email address.

As part of operating various websites, VERBA-TEXT may collect various personal data, which is provided voluntarily, but is often necessary to process your order or

enquiry. If you do not want to provide your data via online forms, you can always contact us directly.

Users of our website (VERBA-TEXT website) remain anonymous until they decide to log in and/or voluntarily provide their personal data.

VII. Consent – withdrawal of consent

In relation to the User, including within the scope of services offered via the website, the User may be asked to consent to the processing of personal data for marketing purposes, including electronic marketing, if your consent may constitute the appropriate legal basis for the processing of personal data. VERBA-TEXT does not require consent in situations where it is not necessary in a specific case (although the obligation to obtain consent may arise from other legal provisions, e.g. consent to telephone or electronic marketing).

The User has the right to withdraw their consent at any time by contacting VERBA-TEXT directly.

Withdrawing consent does not entail any negative consequences or inconveniences – however, you should be aware that withdrawing consent may result in you being unable to use services such as receiving newsletters, promotional offers, invitations to events, etc., for which we are required by law to obtain your consent.

Please note that withdrawing your consent does not affect the lawfulness of the processing of your data that was carried out on the basis of your consent prior to its withdrawal.

Your request to withdraw your consent will be processed immediately. Once your request has been processed, we will cease to process your data for marketing purposes, including for the purpose of receiving marketing and commercial information by electronic means and by telephone. However, until your request is processed, you may still receive information from us that you opted out of by withdrawing your consent.

If we hold your data for other purposes (e.g. performance of a contract, provision of a service, evidence, pursuit of claims), we may continue to process it for those purposes on a different legal basis.

VIII. Data storage

VERBA-TEXT stores personal data for the period necessary to achieve the purposes of which the User has been informed.

The period of storage of personal data is determined in strict accordance with applicable law. You have the right to obtain information from us about the likely period of storage of your personal data.

IX. Sharing data with other entities

With the User's consent, depending on the purpose of data processing and the content of the consent to processing and sharing, your personal data may be shared with the entities indicated in the consents.

We may share your data with processors – companies providing services on our behalf, to whom we outsource activities requiring data processing, in particular in the

field of IT services, marketing services (including marketing agencies), accounting, market research, event organisation and implementation, and call centres.

For marketing purposes, the recipients of your personal data as a processor may be VERBA-TEXT partners acting on behalf of and on the instructions of VERBA-TEXT.

Please note that if the recipients of the data collect personal data from the User independently and on their own behalf and, for example, offer products and services through their own channels, they are then separate data controllers and, in this respect, bear their own responsibility for the processing of such personal data, and are not subject to the terms of our Policy.

X. Cookies

In connection with your use of VERBA-TEXT websites, VERBA-TEXT also collects data contained in system logs. VERBA-TEXT uses this data primarily for technical purposes related to the administration of our servers. In addition, VERBA-TEXT uses this information for the purpose of collecting statistical demographic information. The statistics we collect allow us to analyse the use of the functionalities provided by VERBA-TEXT websites. System logs collect information about IP addresses (network interface numbers), but this data does not allow us to uniquely identify a user (i.e. a specific natural person using a computer or other device connected to the Internet).

Cookies

Cookies are small text files sent by the website and stored on the User's computer (or other device used by the User). We do not use cookies to collect personal data such as name, surname or email address.

The website uses cookies to recognise the User's personal preferences. In other words, cookies used by websites allow the User's computer to be recognised during their next visit to the website and are only intended to facilitate the use of the website.

Profiling

As part of the processing of Users' personal data, we may carry out profiling:

- a) based on the User's consent - in order to select product and service offers tailored to the needs of a given User (including the use of automated processes consisting in compiling your data within the scope of the consent given, originating from various sources (including data collected by VERBA-TEXT or websites) and the profile assigned on this basis, which results in the selection and presentation of advertisements or offers corresponding to your profile;
- b) without consent, based on our legitimate interest in the processing of cookies, in order to tailor the content and marketing messages displayed on the VERBA-TEXT websites and other websites you visit to your preferences and interests, based on data such as: visits to websites and clicks within individual functionalities of VERBA-TEXT websites, login and registration dates, data on the use of individual services on VERBA-TEXT websites.

Banner advertising

We use the data collected during your visit to our websites to display banner advertising (advertisements). This advertising usually uses cookies or pixels. Our goal is to develop an advertising offer that is attractive and beneficial to the User, which is why banner advertising primarily shows the User products that they have already viewed on our website or products similar to those they have previously viewed on other websites (so-called retargeting). We do not use personal data that would directly identify a specific User in banner advertising.

XI. Changes to the Policy

Verba-Text Limited Liability Company reserves the right to make changes to this policy, which may result from the need to adapt to changes in the law or applicable privacy standards, or to expand our offer. Therefore, Verba-Text Limited Liability Company will inform you of any changes in an appropriate message on its websites.

XII. Copyright

All rights to the www.verba-text.pl website, including all its graphic elements, photographs, layout and any other elements, are reserved. The Website and all its elements are protected by law, in particular the Act of 4 February 1994 on copyright and related rights (consolidated text: Journal of Laws of 2017, item 880, as amended), the Act of 16 April 1993 on Combating Unfair Competition (consolidated text Journal of Laws of 2018, item 419) and the Act of 27 July 2001 on the Protection of Databases (Journal of Laws of 2001, No. 128, item 1402, as amended).

XIII. Price lists

The price lists and other information contained on the website www.verba-text.pl do not constitute a commercial offer. Due to promotional campaigns and/or the expected time of service delivery, the prices presented on the website and in the price lists are subject to change.