

## PRIVACY POLICY

### 1. DEFINITIONS

- 1.1. **Administrator** or **Company** or **SE16N** – SE16N Sp. z o. o. with its registered office in Warsaw, Al. KEN 55/64, 02-797 Warsaw.
- 1.2. **Personal data** – all information on a natural person, or a person identified or identifiable by one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural, or social identity, including device IP, location data, internet identifier, and information collected through cookies or other similar technology.
- 1.3. **Policy** – this Privacy policy.
- 1.4. **GDPR** – Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC.
- 1.5. **Website** – a website maintained by the Administrator at one of the following web addresses:
  - a) <https://se16n.com/>
  - b) <https://www.kickstarter.se16n.com/>
  - c) <https://academy.se16n.com/>
- 1.6. **User** – any natural person visiting the Website or using one or several services or functionalities described in this Policy.

### 2. PROCESSING OF DATA IN CONNECTION WITH THE USE OF THE WEBSITE

- 2.1. The Administrator collects information on the User's activity on the Website and data in the scope necessary to provide particular services offered in connection with the User's use of the Website. The detailed principles for processing personal data collected during the use of the Website by the User are described below.

### 3. OBJECTIVES AND LEGAL BASIS FOR PROCESSING DATA ON THE WEBSITE

#### USING THE WEBSITE

- 3.1. Personal data of all persons using the Website (including the IP address or other identifiers or information collected through cookies or other similar technologies), and of those not being registered Users (i.e. persons without a profile on the Website) is processed by the Administrator:
  - 3.1.1. in order to provide services electronically in the field of making collected content available to Users on the Website – the legal basis for the processing is the necessity of processing to perform the contract (Article 6 para. 1 (b) of the GDPR);

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- 3.1.2. for analytical and statistical purposes – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) which involves analyzing the User's activity and preferences to improve the functionalities and services provided;
  - 3.1.3. in order to possibly set and enforce claims or defend against them – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) consisting in the protection of his/her rights;
  - 3.1.4. for marketing purposes of the Administrator and other entities, in particular, those related to the presentation of behavioral advertising – the principles of processing personal data for marketing purposes are described in the "MARKETING" section.
- 3.2. The User's activity on the Website, including his/her personal data, is recorded in system logs (a special computer program used for storing a chronological record containing information on events and activities regarding the IT system used to provide services by the Administrator). Information collected in logs is processed primarily for purposes related to the provision of services. The Administrator processes the information also for technical and administrative purposes, to ensure the security of the IT system and management of this system, as well as for analytical and statistical purposes – in this respect, the legal basis for processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR).

## CONTACT FORMS

- 3.3. The Administrator provides the opportunity to contact him/her using electronic contact forms. Using the form requires providing personal data necessary to contact the User and reply to the request. The User may also provide other data to facilitate contact or service of the inquiry. Providing data marked as mandatory is required in order to receive and service the request, and failure to do so results in a lack of service. Providing other data is voluntary.
- 3.4. Personal data is processed:
- 3.4.1. in order to identify the sender and handle his/her inquiry sent by the form provided – the legal basis for the processing is the necessity of processing to perform the contract for the provision of the service (Article 6 para. 1 (b) of the GDPR); and in the field of optional data provided – the legal basis for processing is consent (Article 6 para. 1 (a) of the GDPR);
  - 3.4.2. for analytical and statistical purposes – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) which consists in keeping statistics on queries submitted by Users via the Website in order to improve its functionality.

## REGISTRATION FOR EVENTS ORGANISED BY SE16N

- 3.5. Persons who register for events organized by the Administrator are requested to provide the data necessary for the registration, establishing contact, and enabling them to participate in the event. In order to facilitate the service, the User may provide additional data, thereby agreeing to their processing. Such data can be deleted at any time. Providing

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data marked as mandatory is required to set up and service an account, and failure to do so results in the inability to set up an account. Providing other data is voluntary.

**3.6.** Personal data is processed:

- 3.6.1.** in order to provide services related to registration, and to enable participating in the event offered – the legal basis for the processing is the necessity of processing to perform the contract (Article 6 para 1. (b) of the GDPR); and in the field of optional data provided – the legal basis for processing is consent (Article 6 para. 1 (a) of the GDPR);
- 3.6.2.** for analytical and statistical purposes – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) consisting in analyzing Users' activity on the Website and the use of the account, as well as their preferences to improve the functionalities used;
- 3.6.3.** for the purposes related to maintaining contact with the User on matters related to the organized event or related initiatives – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para 1. (f) of the GDPR) consisting in the maintenance of business relations with persons interested in services provided by SE16N;
- 3.6.4.** in order to possibly set and enforce claims or defend against them – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) consisting in the protection of his/her rights;
- 3.6.5.** via the Website to improve its functionalities.

## **4. MARKETING**

- 4.1.** The Administrator processes Users' personal data in order to carry out marketing activities, which may consist in:
  - 4.1.1.** displaying to the User marketing content corresponding to his/her interests (behavioral advertising);
  - 4.1.2.** directing email notifications about interesting offers or content, which in some cases contain commercial information (newsletter service)
  - 4.1.3.** conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means and telemarketing activities).
- 4.2.** In order to implement marketing activities, the Administrator uses profiling in some cases. This means that due to the automatic processing of data, the Administrator evaluates selected factors concerning Users in order to analyze their behavior or create a forecast for the future. This allows for better tailoring of the displayed content to individual preferences and interests of the User.

## **BEHAVIORAL ADVERTISING**

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**4.3.** The Administrator and his/her trusted partners process Users' personal data, including personal data collected through cookies and other similar technologies, for marketing purposes in connection with the targeting of behavioral advertising to Users (i.e. advertising that is tailored to the User's preferences). In this case, the processing of data also includes the profiling of Users.

**4.4.** List of trusted partners of the Administrator:

Partner name	The purpose of processing	Link to a partner's privacy policy
Google Inc.	Tailoring the advertising content, collecting information on the User's behavior, social media.	<a href="https://policies.google.com/privacy?hl=pl">https://policies.google.com/privacy?hl=pl</a>

## NEWSLETTER

**4.5.** The Administrator provides the newsletter service on the terms set out in the regulations to persons who have given their email address for this purpose. Providing data is required to provide the newsletter service, and failure to do so results in the inability to send it. This form of communication with the User may involve profiling.

**4.6.** Personal data is processed:

**4.6.1.** in order to provide the newsletter service – the legal basis for processing is the necessity of processing to perform the contract (Article 6 para.1 (b) of the GDPR);

**4.6.2.** in case of sending marketing content to the User as part of the newsletter – the legal basis for the processing, including profiling, is the legitimate interest of the Administrator (Article 6 para. 1 (f) of the GDPR) and the consent to receive the newsletter;

**4.6.3.** for analytical and statistical purposes – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para. 1(f) of the GDPR) involving the analysis of Users' activity on the Website in order to improve the functionalities used;

**4.6.4.** in order to possibly set and enforce claims or defend them – the legal basis for the processing is the legitimate interest of the Administrator (Article 6 para.1 (f) of the GDPR) to protect his/her rights.

## DIRECT MARKETING

**4.7.** The User's personal data may also be used by the Administrator to send marketing content to him/her through various channels, i.e. via email, by SMS/MMS, or by phone. Such actions are taken by the Administrator only upon the User's consent, which he/she can withdraw at any time.

**4.8.** The Administrator may also conduct direct marketing via traditional mail in some cases. The User will be informed in a separate manner about the intention to conduct such marketing. The User has the right to object to this type of marketing.

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## 5. SOCIAL MEDIA

- 5.1. The Administrator processes personal data of Users visiting Administrator profiles carried out in social media (Facebook, YouTube, Twitter). The data is processed only in connection with maintaining the profile, including to inform Users about the activity of the Administrator and to promote various types of events, services, and products. The legal basis for the processing of personal data by the Administrator for this purpose is his/her legitimate interest (Article 6 para. 1 (f) of the GDPR), which consists in promoting his/her own brand.

## 6. COOKIES AND SIMILAR TECHNOLOGY

- 6.1. Cookies are small text files installed on the device of the User browsing the Website. Cookies collect information that facilitates the use of the Website – for example, by memorizing the User's visits to the Website and the activities carried out by him/her.

### “SERVICE” COOKIES

- 6.2. The Administrator uses the so-called service cookies primarily to provide the User with services provided electronically and to improve the quality of these services. Therefore, the Administrator and other entities providing his/her analytical and statistical services use cookies by storing information or accessing information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:

- 6.2.1. user input cookies with data entered by the User (session identifier) for the duration of the session;
- 6.2.2. authentication cookies used for services requiring authentication for the duration of the session;
- 6.2.3. user centric security cookies used to ensure security, e.g. cookies used to detect abuse in the field of authentication;
- 6.2.4. multimedia player session cookies for multimedia players (e.g. flash player cookies), for the duration of the session;
- 6.2.5. user interface customization cookies – permanent cookies used to personalize the User interface for the duration of the session or a bit longer.

### “MARKETING” COOKIES

- 6.3. The Administrator and his trusted partners also use cookies for marketing purposes, among others in connection with the targeting of behavioral advertising to Users. For this purpose, the Administrator and trusted partners store information or access information already stored in the User's telecommunications terminal device (computer, telephone, tablet, etc.).

## GOOGLE ANALYTICS

- 6.4. Google Analytics cookies are the files which are used by Google in order to analyse how a User uses the website, to generate statistics and reports regarding the functioning of the Website. Google does not use the collected data to identify Users and it does not combine these information in order to allow identification. Detailed information about the scope and rules of data collection in connection with this service may be found at: <https://www.google.com/intl/pl/policies/privacy/partners>.

## GOOGLE ADWORDS

- 6.5. Google Adwords is a tool which enables the measurement of efficiency of advertising campaigns realized by the Administrator, allowing to analyse such data as, for instance, keywords or number of unique users. Google Adwords platform also allows for a display of our advertisements to person who visited our Website in the past. Information on the processing of data by Google in the scope of the above specified service is available at: <https://policies.google.com/technologies/ads?hl=pl>.

## 7. COOKIE SETTINGS MANAGEMENT

- 7.1. The use of cookies to collect information with their use, including obtaining the access to data stored on the User's device, requires the User's consent. The consent can be withdrawn at any time.
- 7.2. The consent is not required only in the case of cookies, the use of which is essential for providing telecommunications services (the transmission of data to display content).
- 7.3. The withdrawal of consent to use cookies is possible through the change of browser settings. For details please visit the following websites:
- 7.3.1. Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- 7.3.2. Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- 7.3.3. Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- 7.3.4. Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- 7.3.5. Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>
- 7.4. The User can at any time verify the status of his/her current privacy settings for the browser used with the use of tools available at the following websites:
- 7.4.1. <http://www.youronlinechoices.com/pl/twojedybory>
- 7.4.2. <http://optout.aboutads.info/?c=2&lang=EN>

## 8. PERIOD OF PERSONAL DATA PROCESSING

- 8.1. The period of data processing by the Administrator depends on the type of service provided and the purpose of the processing. As a rule, the data is processed by the time the service is provided or the order is being processed, until the consent is withdrawn or the effective objection to data processing is filed in cases where the legal basis for data processing is the legitimate interest of the Administrator.
- 8.2. The data processing period may be extended if the processing is necessary to establish and assert any claims or defend against them, and after that time only if and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

## 9. USER RIGHTS

- 9.1. The User has the right to: access the data contents and demand their rectification, deletion, processing restrictions, the right to transfer data and the right to object to the processing of data, as well as the right to file a complaint to the supervisory body dealing with the protection of personal data.
- 9.2. To the extent that User's data is processed on the basis of consent, it can be withdrawn at any time by contacting the Administrator or with the use of functionalities available on the Website. For contact details please see point 14.1.
- 9.3. The User has the right to object to the processing of data for marketing purposes, if the processing takes place in relation to the justified interest of the Administrator, and – for reasons related to the special situation of the User – in other cases where the legal basis for data processing is the legitimate interest of the Administrator (e.g. in connection with the implementation of analytical and statistical objectives).
- 9.4. For more information about rights under the GDPR, click [Transparency policy](#).

## 10. DATA RECIPIENTS

- 10.1. In connection with the implementation of services, personal data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems, entities such as banks and payment operators, entities providing accounting services, couriers (in connection with the performance of the contract), marketing agencies (in the scope of marketing services) and entities associated with the Administrator, including companies from his/her capital group.
- 10.2. If the User agrees, his/her data may also be made available to other entities for their own purposes, including marketing purposes.
- 10.3. The Administrator reserves the right to disclose selected information about the User to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with applicable law.

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## 11. TRANSMISSION OF DATA OUTSIDE THE EEA

11.1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Administrator transfers personal data outside the EEA only when it is necessary and with an adequate level of protection, primarily through:

11.1.1. cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission concerning the adequate level of protection of personal data was made;

11.1.2. use of standard contractual clauses issued by the European Commission;

11.1.3. applying binding corporate rules, approved by the competent supervisory authority;

11.1.4. in the event of data transfer to the USA – cooperation with entities participating in the Privacy Shield program, approved by the European Commission.

11.2. The Administrator always informs about the intention to transfer personal data outside the EEA at the collection stage.

## 12. SECURITY OF PERSONAL DATA

12.1. The Administrator conducts risk analysis on an ongoing basis to ensure that personal data is processed in a secure manner – ensuring, above all, that only authorized persons have access to the data and only to the extent that it is necessary due to the tasks performed by them. The Administrator makes sure that all operations on personal data are recorded and made only by authorized employees and associates.

12.2. The Administrator undertakes all necessary actions so that his/her subcontractors and other cooperating entities would guarantee that appropriate security measures will be applied whenever they process personal data at the request of the Administrator.

## 13. CONTACT DETAILS

13.1. Contact with the Administrator is possible via the email address: [rodo@se16n.com](mailto:rodo@se16n.com) or via the mailing address: Al. KEN 55/64, 02-797 Warsaw.

## 14. CHANGES IN THE PRIVACY POLICY

14.1. The policy is verified on an ongoing basis and updated if necessary.

14.2. The current version of the Policy has been adopted and is valid from 05/05/2020.

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