

# PRIVACY POLICY OF THE WEBSITE 4MW.CO

## GENERAL PROVISIONS

This Website privacy policy is for informational purposes, which means that it is not a source of obligations for Website Service Recipients. The Privacy Policy primarily contains rules regarding the Administrator's processing of personal data on the Website, including the basis, purposes and scope of personal data processing and the rights of data subjects, as well as information regarding the use of cookies and analytical tools on the Website.

The administrator of the personal data is 4mw sp. z o.o. with its registered office in Starogard Gdański, 83-200 Starogard Gdański, ul. Droga Owidzka 1i, registered in the register of entrepreneurs kept by the District Court for Gdańsk-North in Gdańsk, VII Economic Department of the National Court Register under the KRS number 0001056311, NIP 592-22-95-696 and share capital of PLN 320,000.00, paid in full, represented by Mr. Marcin Mierzwicki as the President of the Management Board and Mr. Maciej Mierzwicki as a Member of the Management Board, e-mail address: hello@4mw.co and telephone number: +48 570 753 620- hereinafter referred to as the "Administrator" and being at the same time the Owner of the Website.

Personal data on the Website are processed by the Administrator in accordance with applicable laws, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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) - hereinafter referred to as "RODO" or "RODO Regulation". Official text of the RODO Regulation: <http://eur-lex.europa.eu/legalcontent/PL/TXT/?uri=CELEX%3A32016R0679>

The use of the Website is voluntary. Likewise, the related provision of personal data by the Customer using the Website is voluntary, subject to two exceptions: (1) conclusion of contracts with the Administrator: failure to provide personal data in the cases and to the extent required - for the conclusion and performance of a Sales Agreement or an agreement for the provision of Electronic Services with the Administrator - results in the impossibility of concluding such agreement. Provision of personal data in such a case is a contractual requirement, and if the data subject wishes to conclude a given agreement with the Administrator, he/she is obliged to provide the required data. Each time, the scope of data required to conclude a contract is indicated by the Administrator; (2) statutory obligations of the Administrator: providing personal data is a statutory requirement under generally applicable laws imposing an obligation on the Administrator to process personal data (e.g., processing data for tax or accounting purposes), and failure to provide such data will prevent the Administrator from performing such obligations.

The controller shall exercise special care to protect the interests of persons whose personal data it processes, and in particular shall be responsible for and ensure that the data it collects are: (1) processed in accordance with the law; (2) collected for designated legitimate purposes and not subjected to further processing incompatible with those purposes; (3) substantively correct and adequate in relation to the purposes for which they are processed; (4) kept in a form that allows identification of the data subjects for no longer than necessary to achieve the purpose of the processing; and (5) processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures.

Taking into account the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons with different probability and severity of the threat, the Administrator shall implement appropriate technical and organizational measures to ensure that the processing is carried out in accordance with this Regulation and to be able to demonstrate this. These measures shall be reviewed and updated as necessary. The Administrator shall use technical measures to prevent unauthorized persons from obtaining and modifying, personal data sent electronically.

All words, phrases and acronyms appearing in this Privacy Policy and beginning with a capital letter (e.g. Website, Electronic Service) shall be understood in accordance with their meaning herein.

**GROUNDS FOR DATA PROCESSING**

The controller is authorized to process personal data in cases where, and to the extent that, at least one of the following conditions is met: (1) the data subject has given his or her consent to the processing of his or her personal data for one or more specified purposes; (2) the processing is necessary for the performance of a contract to which the data subject is a party or to take action at the request of the data subject prior to entering into a contract; (3) the processing is necessary for the fulfillment of a legal obligation incumbent on the Administrator; or (4) processing is necessary for the purposes of legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Processing of personal data by the Controller requires the existence of at least one of the grounds indicated above in each case. The specific grounds for the Administrator's processing of personal data of the Website's Service Recipients are indicated in the next section of the Privacy Policy - with respect to the particular purpose of the Administrator's processing of personal data.

**PURPOSE, BASIS, PERIOD AND SCOPE OF DATA PROCESSING ON THE WEBSITE**

In each case, the purpose, basis, period and scope and recipients of the personal data processed by the Administrator shall result from the activities undertaken by the respective Service Recipient on the Website.

The Administrator may process personal data on the Website for the following purposes, on the following grounds, for the following periods and to the following extent:

Purpose of data processing	Legal basis for processing and data retention period	Scope of data processed
Performance of a contract for the provision of an Electronic Service or taking action at the request of the data subject prior to the conclusion of the contract	Article 6(1)(b) of the RODO Ordinance (performance of a contract)Data shall be kept for the period necessary to perform, terminate or otherwise expire the contract entered into.	Maximum scope: first name, email address.
Direct marketing	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) Data shall be stored for the period of existence of the legitimate interest pursued by the Administrator, but no longer than the statute of limitations for claims against the data subject for the Administrator's business activities. The statute of limitations is determined by law, in particular the Civil Code (the basic statute of limitations for claims related to the conduct of business activities is three years, and for a sales contract two years). The administrator may not process data for the purpose of marketing Direct marketing in the event of an effective objection in this regard by the data subject	E-mail address

Marketing	Article 6(1)(a) of the RODO Regulation (consent) Data shall be stored until withdrawal of consent by the data subject for further processing of his/her data in this ce	Name, e-mail address
Determination, investigation or defense of claims that may be raised by the Administrator or that may be raised against the Administrator	Article 6(1)(f) of the RODO Regulation.  Data shall be kept for the period of existence of the legitimate interest pursued by the Administrator, but no longer than the statute of limitations for claims against the data subject for the Administrator's business activities. The statute of limitations is determined by law, in particular the Civil Code (the basic statute of limitations for claims related to the conduct of business activities is three years, and for a sales contract it is two years).	First and last name; contact telephone number; email address; delivery address (street, house number, apartment number, postal code, city, country), residential/business address (if different from delivery address). In the case of Service Recipients or Clients who are not consumers, the Administrator may additionally process the company name and tax identification number (NIP) of the Service Recipient or Client.

#### **RECIPIENTS OF DATA ON THE WEBSITE**

For the proper functioning of the Website, it is necessary for the Administrator to use the services of third parties (such as a software provider). The Administrator shall only use the services of such processors who provide sufficient guarantees to implement appropriate technical and organizational measures so that the processing meets the requirements of the RODO Regulation and protects the rights of data subjects. The transfer of data by the Administrator does not take place in every case and not to all recipients or categories of recipients indicated in the Privacy Policy - the Administrator transfers data only when it is necessary for the realization of a given purpose of personal data processing and only to the extent necessary for its realization. Personal data of Website Service Recipients may be transferred to the following recipients or categories of recipients:

- service providers supplying the Administrator with technical, IT and organizational solutions that enable the Administrator to conduct its business, including the Website and the Electronic Services provided through it (in particular, providers of computer software to run the Website, providers of e-mail and hosting, and providers of business management and technical support software to the Administrator) - the Administrator shall make the collected personal data of the Client available to the selected provider acting on its behalf only in the case and to the extent necessary to realize the given purpose of data processing in accordance with this Privacy Policy.
- Providers of accounting, legal and advisory services providing accounting, legal or advisory support to the Administrator (in particular, an accounting office, law firm or debt collection company) - the Administrator shall make the collected personal data of the Client available to the selected provider acting on its behalf only in the case and to the extent necessary to realize the given purpose of data processing in accordance with this Privacy Policy.

#### **RIGHTS OF THE DATA SUBJECT**

Right of access, rectification, restriction, erasure or portability - the data subject has the right to request from the Controller access to his/her personal data, rectification, erasure ("right to be forgotten") or restriction of processing, and has the right to object to processing, and has the right to portability of his/her data. The detailed conditions for exercising the rights

indicated above are indicated in Articles 15-21 of the RODO Regulation. Right to withdraw consent at any time - a person whose data is processed by the Administrator on the basis of expressed consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the RODO Ordinance), then he/she has the right to withdraw consent at any time without affecting the legality of the processing performed on the basis of consent before its withdrawal.

Right to lodge a complaint to a supervisory authority - a person whose data is processed by the Administrator has the right to lodge a complaint to a supervisory authority in the manner and mode specified in the provisions of the RODO Regulation and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Office for Personal Data Protection. Right to object - the data subject has the right to object at any time - for reasons related to his or her particular situation - to the processing of personal data concerning him or her based on Article 6(1)(e) (public interest or tasks) or (f) (legitimate interest of the controller), including profiling under these provisions. In such case, the controller shall no longer be allowed to process such personal data, unless the controller demonstrates the existence of compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for establishing, asserting or defending claims. Right to object to direct marketing - if personal data are processed for the purposes of direct marketing, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing. In order to exercise the rights referred to in this section of the Privacy Policy, the Administrator may be contacted by sending an appropriate message in writing or by e-mail to the Administrator's address indicated at the beginning of the Privacy Policy or by using the contact form available on the Website.

### **WEBSITE COOKIES, USAGE DATA AND ANALYTICS**

Cookies are small text information in the form of text files, sent by a server and stored on the side of the person visiting the Website (e.g. on the hard drive of a computer, laptop, or smartphone memory card - depending on the device used by the visitor to our Website). Detailed information about cookies, as well as the history of their creation, can be found, among others, here: <http://pl.wikipedia.org/wiki/Ciasteczko>.

The Administrator may process data contained in Cookies when visitors use the Website for the following purposes:

- customize the content of the Website to the individual preferences of the Service Recipient (e.g. regarding colors, font size, page layout) and optimize the use of the Website

Internet;

- keeping anonymous statistics showing how the Website is used;
- remarketing, that is, studying the behavioral characteristics of visitors to the Website by anonymously analyzing their actions (e.g., repeated visits to certain pages, keywords, etc.) in order to create their profile and provide them with ads tailored to their anticipated interests, including when they visit other websites on the advertising network of Google Inc. and Facebook Ireland Ltd;

By default, most web browsers on the market accept the storage of Cookies by default. Everyone has the ability to determine the conditions for the use of Cookies through the settings of their own web browser. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the possibility of storing Cookies - in the latter case, however, this may affect some functionalities of the Website. Your browser settings regarding Cookies are relevant to your consent to the use of Cookies by our Website - in accordance with the regulations, such consent can also be expressed through your browser settings. In the absence of such consent, you must change your browser settings for Cookies accordingly. Detailed information on how to change the settings for Cookies and how to delete them yourself in the most popular web browsers is available in the help section of your web browser and on the following pages (just click on the link):

- in Chrome browser
- in Firefox browser
- in Internet Explorer browser
- in Opera browser
- in Safari browser
- in Microsoft Edge browser

The Administrator may use on the Website the services of Google Analytics, Universal Analytics provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. These services help the Administrator analyze traffic on the Website. The data collected is processed by the aforementioned services in an anonymized manner (this is so-called exploitation data, which prevents identification of the person) to generate statistics to help administer the Website. These data are aggregate and anonymous, i.e. they do not contain identifying characteristics (personal data) of visitors to the Website. When using the above services on the Website, the Administrator collects such data as the source and medium of acquisition of visitors to the Website and the way they behave on the Website, information on the devices and browsers from which they visit the Website, IP and domain, geographic data and demographic data (age, gender) and interests. It is possible for a person to easily block Google Analytics from sharing information about their activity on the Website - for this purpose, you can install a browser add-on provided by Google Inc. available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

Starogard Gdański, January 02, 2024.