

PRIVACY AND COOKIE POLICY USED IN THE OF EXACT SYSTEMS INTERNET SERVICE

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I. Introduction

1. General provisions

This privacy and cookie policy concerns processing and protection of Personal Data on account of using Exact Systems Service by them.

The Controller respects the right to privacy of Service Users, especially taking care of Personal Data protection, and applies proper organisational and technical measures preventing

interference with Users' privacy by third parties. Activities of the Controller are focused on providing the User with the sense of security at the level stipulated for in the applicable laws.

Personal data processing takes place in accordance with the principles specified in:

- 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
- Domestic laws of the Controller.

Logging to and use of the Service means that the User accepts terms and conditions of this Policy and confirms that it has read them.

No links referring to other websites can be put in the Service. Websites will open in a new or the same browser window. The Controller shall not be held liable for the content in those websites. Since this privacy and cookie policy concerns only Exact Systems Service, **the User shall be obliged to read the privacy policy or the regulations on the website reached by the User through the reference link.**

2. Definitions

- 2.1. **"Controller"** shall refer to the entity establishing purposes and methods of processing Personal Data, held liable for the processing in compliance with the law; depending on the domain used by the Service User, the Controller shall be the entity indicated in chapter II par. 1 of the Privacy Policy.
- 2.2. **"Joint Controllers"** shall refer to two or more Controllers who have entered joint controlling agreement.
- 2.3. **"Cookies"** shall refer to small text files installed in the User's device viewing the Service. Cookies collect the information that enable to use a given website, e.g. by remembering the User's visits in the Service and actions taken by the User.
- 2.4. **"Personal Data"** shall refer to all pieces of information about the identified or identifiable natural person (the data subject); the identifiable natural person shall refer to an individual that can be directly or indirectly identified, especially on the basis of an identifier such as name and surname, identification number, data concerning location, the Internet identifier or one or a few features specifying physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.
- 2.5. **"Service"** shall refer to the Internet service of Exact Systems available on the following domains: exactsystems.pl, exactsystems.cz, exactsystems.ru, exactsystems.com, exactsystems.hu, exactsystems.ro, exactsystems.sk, exactsystems.nl, exactsystems.cn, exactsystems.de, exactsystems.com.tr, exactsystems.pt, exactsystems.es, exactsystems.be and exactsystems.uk.com.
- 2.6. **"Services"** shall refer to services specified in par. 1.7, 1.8, 1.9, 1.10 and 1.11, rendered electronically as part of the Service by the Service Provider for the User.
- 2.7. **"Website"** shall refer to services rendered electronically by the Service Provider for the User, consisting in making available Materials concerning the Service Provider and/or Exact Systems Group and/or Partners, especially containing the information

about events, services, products and other essential elements from the point of view of the Service Provider for the purpose of performing legitimate interests of the Service Provider, e.g. marketing and own services or services recommended by the Service Provider.

- 2.8. **“Newsletter”** shall refer to the service rendered electronically by the Service Provider for the User by sending electronic mails informing about events, services, products and other essential elements from the point of view of the Service Provider for the purpose of performing legitimate interests of the Service Provider, and/or Exact Systems Group and/or Partners, e.g. marketing and own services or services recommended by the Service Provider.
- 2.9. **“Live Chat”** shall refer to the service constituting an additional communication tool, made available by the Service Provider through the Service which enables contact with the Consultant for the purpose of submitting inquiries concerning work offered by the Service Provider and/or Exact Systems Group and/or Partners.
- 2.10. **“Contact Form”** shall refer to the service constituting an additional communication tool, made available by the Service Provider through the Service which enables contact with the Consultant for the purpose of obtaining response to question(s) contained therein in form of an e-mail or via telephone concerning work offered by the Service Provider and/or Exact Systems Group and/or Partners.
- 2.11. **“Link to Exact People”** shall refer to the service of sending a text message to a telephone number provided by the User with a link to the website www.exactpeople.com where the User can download Exact People application.
- 2.12. **“Exact People application”** shall refer to the application for smartphones, dedicated to people rendering services for Exact Systems Group and people looking for a job in Exact Systems Group. The application provides the information about Exact Systems Group, job offers, recruitment, and facilitates cooperation with Exact Systems Group. It also helps people cooperating with Exact Systems Group to establish days and hours during which they can render services, check their salaries, get the information about novelties and competitions organised by Exact Systems Group. Moreover, it provides a smooth contact with the coordinator.
- 2.13. **“agreement”** shall refer to the Service Provision Agreement between the Service Provider and the User.
- 2.14. **“personal data processing”** shall refer to each operation performed by the Controller with respect to Personal Data, understood as collection, recording, storage, development, alteration, making available, erasure or copying of Personal Data.
- 2.15. **“Partners”** shall refer to entities from Exact Systems Group and all companies and other subsidiaries of the Controller and entities related by equity or personally with the Controller, as well as subsidiaries related by capital or personally with the other companies forming Exact Systems Group; this term also encompasses future entities to be formed or accepted or separated or shall become related by capital or personally with the Controller or other companies from Exact Systems Group.
- 2.16. **“Materials”** shall refer to texts, photos, graphics, charts, video materials, multimedia materials etc., including in particular work within the meaning of the Act

on copyright and related rights that shall be published or made available in the Service by the Service Provider.

- 2.17. **“Consultant”** shall refer to the employee of the Service Provider or a company from Exact Systems Group with which the Service Provider has signed the joint controlling agreement (more about the joint controlling agreement to be found in the Privacy Policy) who takes part in the conversation with the User, conducted with the use of Live Chat.
- 2.18. **“Exact Systems Group”** shall refer to companies the current list of which can be found at <https://exactsystems.pl/grupa-kapitalowa>.
- 2.19. **“Privacy Policy”** shall refer to this Privacy and Cookie Policy in the Internet Service of Exact Systems.
- 2.20. **“GDPR”** shall refer to 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.
- 2.21. **“EEA”** shall refer to a free trade area and common market, covering Member States and the European Free Trade Association (EFTA), with the exception of Switzerland.
- 2.22. **“User”** shall refer to any natural person using the Service.
- 2.23. **“Service Provider”** shall refer to Exact Systems sp. z o.o. with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

II. User’s Personal Data

1. Who is Personal Data Controller of the User?

Personal Data Controller shall be:

- a) In case of using the Service **through the domain exactsystems.pl and exactsystems.com:**

Exact Systems sp. z o.o. with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty;

- b) In case of using the Service **through the domain exactsystems.sk and exactsystems.cz:**

Exact Systems Slovakia s.r.o. Jána Kalinčiaka 22, 010 01 Žilina, Slovakia and **Czech Republic S.R.O.** Na Honech 832/16, 720 00 Ostrava – Hrabová, Czech Republic and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register

of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty;

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.cz/_get/www/Poland-Slovakia-Czech-Republic-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

c) In case of using the Service **through the domain exactsystems.hu**:

Exact Systems Hungary Kft. H-1146 Budapest, Hungária körút 140-144 and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty;

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.hu/_get/www/Poland-Hungary-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

d) In case of using the Service **through the domain exactsystems.ro**:

Exact Systems SRL Blvd. Unirii, N. 27, Bloc 15, Sc.1, Floor 7, Apt. 19 Bucharest, Romania and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty;

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.ro/_get/www/Poland-Romania-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

e) In case of using the Service **through the domain exactsystems.uk.com**:

Exact Systems Ltd 2.09 Grosvenor House, Hollinswood Road, Telford, TF2 9TW and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read

https://exactsystems.uk.com/_get/www/Poland-UK-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

f) In case of using the Service **through the domain exactsystems.es and exactsystems.pt:**

QUALITY LIASON SERVICES AUTOMOTIVE, S.L. Poligono Industrial de Las Gandaras, n°8 36400, O Porrino Pontevedra, Spain, **QLS Automotive, Lda.** Parque Industrial Autoeuropa, CCI 10201 2950-557 Quinta do Anjo and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.es/_get/www/Poland-Spain-Portugal-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

g) In case of using the Service **through the domain exactsystems.de:**

Exact Systems GmbH Am Klinikum 7, 02828 Görlitz and **Exact Systems sp. z o.o. with its registered office in Częstochowa (42-200) at ul. Focha 53/5**, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.de/_get/www/Poland-Germany-Information-of-the-essence-of-agreement-of-Joint-Controllers.pdf

h) In case of using the Service **through the domain exactsystems.nl or exactsystem.be:**

Exact Systems bv Dr. Nolenslaan 157, 6136GM Sittard, Netherlands and **exact Systems Belgium** Hoogstraat, 69, B3600 Genk, Belgium and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

These companies carry out joint controlling of Personal Data of the User on the basis of the joint controlling agreement, the content of essential arrangements of which can be read https://exactsystems.nl/_get/www/Poland-Netherlands-Belgium-Information-on-the-essence-of-the-mutual-agreements-of-Joint-Controllers.pdf

- i) In case of using the Service **through the domain exactsystems.cn:**

Exact Systems China Limited Mingzhu center Room 215, No. 1019 North Nanquan Road Pudong District, Shanghai PR China 200122 and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

Since Exact Systems China Limited is located outside EEA, Exact Systems sp. z o.o. transfers its Personal Data on the basis of standard personal data protection clauses accepted by the Committee which ensure proper security and enforceable rights of the Users as well as effective remedies. A copy of the applied securities shall be available at <https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32001D0497&from=en>

And <https://eur-lex.europa.eu/LexUriServ/LexUriSrv.do?uri=OJ:L:2004:385:0074:0084:PL:PDF>.

- j) In case of using the Service **through the domain exactsystems.com.tr:**

Exact Systems Kalite Kontrol Ltd. Sti. Akdeniz Mah. Vali Kazim Dirik Cad. No: 32/32 K:3 Konak IZMIR/TURKEY and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

Since Exact Systems Kalite Kontrol Ltd. Sti. is located outside EEA, Exact Systems sp. z o.o. transfers its Personal Data on the basis of standard personal data protection clauses accepted by the Committee which ensure proper security and enforceable rights of the Users as well as effective remedies. A copy of the applied securities shall be available at <https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32001D0497&from=en>

And <https://eur-lex.europa.eu/LexUriServ/LexUriSrv.do?uri=OJ:L:2004:385:0074:0084:PL:PDF>.

- k) In case of using the Service **through the domain exactsystems.ru:**

CJSC Exact Systems 123007, Khoroshevskoe highway, 32A, bld. 22, office 428, Russia, Moscow and **Exact Systems sp. z o.o.** with its registered office in Częstochowa (42-200) at ul. Focha 53/5, entered in the register of entrepreneurs of the National Court Register by the District Court in Częstochowa, 17th Commercial Division of the National Court Register under the number KRS 0000729296, Taxpayer Identification Number (NIP) 5272849887, business statistical number (REGON) 380045465, share capital of 100,000.00 zloty.

Since CJSC Exact Systems is located outside EEA, Exact Systems sp. z o.o. transfers its Personal Data on the basis of standard personal data protection clauses accepted by the Committee which ensure proper security and enforceable rights of the Users as well as effective remedies.

A copy of the applied securities shall be available at <https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32001D0497&from=en>

And <https://eur-lex.europa.eu/LexUriServ/LexUriSrv.do?uri=OJ:L:2004:385:0074:0084:PL:PDF>.

2. What principles does the Controller apply while processing Personal Data?

2.24. On account of business activity conducted, the Controller collects and processes Personal Data in accordance with the applicable domestic laws of the Controller, especially GDPR.

2.25. The Controller shall ensure transparency of Personal Data processing, and shall always inform about processing of such data at the moment of collecting them, including the purpose and legal basis for further processing.

2.26. The Controller is particular about all Personal Data to be collected only in the necessary scope for the specific purpose and processed only for a necessary period.

2.27. Processing Personal Data, the Controller shall ensure their safety and confidentiality, and access to the information about Personal Data processing to the Users. If despite applied security measures Personal Data breach took place (e.g. "leakage" or loss of data), the Controller shall inform data subjects about such event in compliance with the law.

2.28. In order to ensure integrity and confidentiality of Personal Data, the Controller have implemented procedures that enable access to Personal Data only to the authorised persons and only in the scope that is necessary with respect to the tasks they perform.

2.29. The Controller shall apply organisational and technical solutions in order to ensure that all operations related to Personal Data shall be registered and made only by the authorised persons.

2.30. Moreover, the Controller shall take all necessary measures to guarantee that its subcontractors and other cooperating entities apply proper safety measures each time they process Personal Data upon the order of the Controller.

2.31. The Controller conducts a risk analysis on a regular basis and monitors adequacy of the applied securities concerning Personal Data to identifiable threats. If necessary, the Controller shall implement additional measures to increase data safety.

3. What Personal Data are processed by the Controller?

3.1. Service

In the event of using the Service by the User, the Controller shall process the following Personal Data:

a) Data necessary to use the Service:

- If the User has not given consent to process its data specified in par. 3.1 letter b) below, it shall be necessary to store the information on the lack of consent which is recorded as a Cookie file;
- b) Data that are necessary to use the Service:
 - Hostname;
 - Type of a browser;
 - Type of the operating system;
 - Access time;
 - Addresses of websites visited in the Service;
 - Address of the website from which the User reached the Service;
 - Other User's identifiers;
 - Information gathered with the use of Cookie files or other similar technologies.

If the User has given consent, the aforementioned data shall be collected both in the case of using the Service and services rendered by external entities with the use of the Service.

Please be informed that by using the Service without changing settings of software/browser, the User gives consent to store Cookie files and similar technologies in the User's device and to use the information stored therein.

3.2. Newsletter

If the User concludes an agreement to receive the Newsletter, the Controller, apart from Personal Data indicated in par. 3.1 above, shall additionally process e-mail address of the User which is necessary to render service connected with sending the Newsletter.

3.3. Contact Form

If the User uses the contact form, the Controller, apart from Personal Data indicated in par. 3.1 above, shall additionally process:

- a) Data necessary to render service related to the Contact Form in the form of:
 - e-mail address or a telephone number;
 - the content of the contact message;
- b) Other Personal Data – if they are voluntarily provided by the User, which shall be understood as giving consent to process them.

3.4. Live Chat

If the User uses Live Chat, the Controller, apart from Personal Data indicated in par. 3.1 above, shall additionally process:

- a) Data necessary to render service related to Live Chat, i.e. the content of the message sent via Live Chat;
- b) other Personal Data, including name and surname and e-mail address – if they are voluntarily provided by the User, which shall be understood as giving consent to process them.

3.5. Link to Exact People

If the User concludes an agreement to use Link to Exact People, apart from Personal Data indicated in par. 3.1 above, shall additionally process the telephone number which is necessary to render service connected with Link to Exact People.

4. Is the provision of Personal Data mandatory for the User?

4.1. Service

Provision of Personal Data specified in par. 3.1 letter a) is voluntary, however, failure to provide them makes it impossible to use the Service.

Provision of the other Personal Data is voluntary. The User's activity of the Service, including its Personal Data, shall be registered in system logs (special computer programme used to store a chronological record containing the information about event and actions concerning IT system used to render services by the Controller). The information about visited websites and the use of the Service and Services available as part of the Service shall also be provided by cookie files. All these tools make the Service user-friendly. Therefore, failure to provide them may have impact on the convenience of use of the Service, prevent its use or make it impossible to display some information for the User. However, most of all it shall prevent the Controller from obtaining anonymous statistical information used to improve the quality of the Service.

Additionally, the use of the Service may require the following additional data to be provided:

a) Newsletter

Provision of e-mail address is voluntary, yet necessary to be provided with the service. Otherwise, Newsletter will not be available.

b) Contact Form

Provision of Personal Data specified in par. 3.3 letter a) is voluntary, yet necessary for the inquiry submitted on the contact form to be accepted and handled, and failure to provide them makes the service unavailable. Provision of other Personal Data is voluntary and has no impact on the inquiry to be accepted and handled.

c) Live Chat

Writing the message and sending it via Live Chat is voluntary, yet necessary for the inquiry to be accepted and handled via Live Chat, and failure to provide them makes the service unavailable. Provision of other Personal Data is voluntary and has no impact on the inquiry to be accepted and handled.

d) Link to Exact People

Provision of the telephone number is voluntary, yet necessary for the purpose of rendering the service. No data makes it impossible to use the service.

5. What are the purposes and legal grounds of processing Personal Data?

The Controller shall process Personal Data for the following purposes:

- a) For the purpose of rendering electronically Services as part of the Service, i.e. Website, Newsletter, Live Chat, Contact Form, Link to Exact People – then processing is necessary for the performance of the agreement (art. 6 par. 1 letter b) of GDPR);
- b) For technical, administration purposes, for the purpose of ensuring safety of IT system and managing such system – then processing is necessary for the purposes of the legitimate interests of the Controller (art. 6 par. 1 letter f) of GDPR);
- c) For analytical and statistical purposes – the consent of the User shall be the legal basis of processing (art. 6 par. 1 letter a) of GDPR);
- d) In the case of the User being provided with marketing content as part of own marketing - the consent of the User shall be the legal basis of processing (art. 6 par. 1 letter a) of GDPR);
- e) For the purpose of possible establishing and asserting claims or protecting against them - then processing is necessary for the purposes of the legitimate interests of the Controller (art. 6 par. 1 letter f) of GDPR).

6. How long are Personal Data processed?

The period of Personal Data processing by the Controller depends on the type of services rendered and the purpose of processing. The period of Personal Data processing may also result from the provisions of the law when they constitute the basis of processing. In the event of processing Personal Data on the basis of the legitimate interest of the Controller, e.g. for security reasons, data are processed for the period that enables achievement of such interest or to report effective objection against data processing. If processing takes place on the basis of the consent, Personal Data are processed until such consent has been withdrawn. If processing takes place on the basis of necessity to conclude and perform the agreement, Personal Data are processed until such agreement has expired/been terminated. The period of Personal Data processing can be extended when the processing is indispensable for establishing or asserting claims or protecting against them, and after such period only in the case and in the scope required by the law. After the expiry of the processing period Personal Data are permanently erased or anonymised.

7. Recipients of Personal Data

7.1. Users' Personal Data can be made available to entities rendering services upon the order and on behalf of the Controller, e.g. to handle the Service and available Services, especially in the scope of IT services, marketing services, analytical services, archiving, professional advisors. The Controller shall make such data available on the basis of personal data processing agreement or other legal instrument in accordance with art. 28 of GDPR, which shall ensure proper protection of Personal Data.

7.2. In justified cases, Users' Personal Data can also be made available to entities authorised to obtain them on the basis of the applicable laws, e.g. law-enforcement authorities, should the authority request such data to be disclosed on the basis of the relevant legal basis (e.g. for the purpose of pending criminal proceedings).

7.3. Personal Data processed by the Controller shall not be made available to third parties, subject to par. 7.1. and 7.2. above, unless:

- a) the obligation to disclose Personal Data results from the applicable laws or when Personal Data are to be provided for the purpose of protecting rights of the Controller or settling disputes; or
- b) the User has given consent to provide personal data to third parties.

7.4. In each of the aforementioned situations Personal Data can be made available only in the event of a material legal basis (e.g. consent, e.g. in case of marketing, agreement or legitimate interest).

7.5. Providing Personal Data on the basis of the processing agreement referred to in par. 7.1. above, the Controller shall oblige third parties to observe securities and procedures connected with Users' Personal Data protection required by the law. In such event these entities shall not be authorised to use Users' Personal Data for own purposes (data shall always be processed on behalf of and for the needs of the Controller), and their actions are subject to the applicable laws and this Privacy Policy.

7.5. The Controller shall not sell Users' Personal Data.

7.6. In the case of reorganisation or sales of the activity or its part and transfer of the entire property or its part to the new owner, Users' Personal Data can be transferred to the buyer for the purpose of continuing business activity.

8. Transfer of Personal Data outside European Economic Area

It is possible to transfer Users' Personal Data outside the European Economic Area (EEA) provided that proper level of Personal Data protection shall be ensured and acknowledged in particular by:

- a) The cooperation with the entities processing personal data in the countries with reference to which a relevant decision of the European Commission has been issued;
- b) Observance of standard contractual clauses issued by the European Commission;
- c) Observance of valid corporate rules approved by a competent supervisory authority;
- d) In the case of transferring data to the USA – the cooperation with entities taking part in the Privacy Shield programme, approved by the decision of the European Commission.

9. Does automated decision-making and profiling of the User take place on the basis of Personal Data which have impact on the user?

The Controller shall use Personal Data for assessment and automated profiling. The assessment and profiling shall be conducted for purpose of analysing of data concerning the User's activity in the Service, collecting demographic data concerning the User or for the purpose of personalisation of the content of the Service in order to improve it. Profiling has no legal effects for the User, nor has it any impact on the User's possibility to use the Service. It is used first of all in order to help the Controller get to know preferences and behaviours of the Service Users, and to improve the Service on the basis of such analysis. Therefore, such data are only processed for the purpose of administering the website and ensuring efficient hosting services and are not associated with the data of individual Users.

III. Users' rights

1. Right of access

The User shall have the right at any time to obtain information whether and what type of Personal Data are processed by the Controller. If the Controller processes the User's Personal Data, the User may obtain access to them or ask the Controller for a copy of Personal Data being subject to processing. The first copy of Personal Data is provided free of charge, the next copies can be issued against payment.

2. Right to rectify Personal Data

The User can request at any time that the Controller immediately rectify its incorrect or incomplete Personal Data.

3. Right to restrict Personal Data

The User may request at any time that processing of its Personal Data be restricted by the Controller. If the request is justified, the Controller shall only be authorised to store such Personal Data. Any other actions, apart from storing, requires a separate consent, unless processing is necessary on account of protection of claims or rights of other person or on account of crucial reasons related to the public interest.

4. Right to transfer Personal Data

If Personal Data of the User are processed in the automated manner on the basis of the User's consent or on account of the performance of the agreement, the User may request at any time that the Controller provide its Personal Data in a structured, commonly used and machine-readable format. Upon the request of the User, Personal Data shall be sent by the Controller to other controller indicated by the User, should it be technically possible.

5. Right to erase Personal Data (the so-called right to be forgotten)

The User shall have the right to request that the Controller immediately erase its Personal Data , and if any of the grounds occurs specified in art. 17 of GDPR, the Controller shall be obliged to erase them without undue delay.

6. Right to object

If the Controller processes Personal Data of the User on the basis of a legitimate interest, the User may object to such processing at any time.

7. Right withdraw consent

7.1. The User may withdraw consent for Personal Data processing at any time. Withdrawal shall not affect compliance of the processing with the law, which processing took effect prior to the withdrawal.

7.2. In order to effectively withdraw the consent:

- a) In the case of using the Service and the Services – one should contact the Controller in the manner specified in chapter III.9.6. of the Privacy Policy;
- b) In the case of subscription for the Newsletter – one should use the deactivation link to be found at the end of the Newsletter and confirm resignation from the Newsletter.

7.3. The Controller assures that the application for the withdrawal of consent shall be investigated forthwith. After the application has been investigated, the Controller shall stop processing Personal Data of the User processed on the basis of the consent (e.g. for the purpose of obtaining marketing and commercial information electronically and via telephone). Until the moment of investigating the application it may happen that the User shall receive information from the Controller of which it resigned by withdrawing the consent on account of the time needed to process the application in the User's systems.

7.4. Withdrawal of the consent by the User shall not exclude further processing of Personal Data with the reservation that further processing shall take place for other purpose and on other grounds than processing made on the basis of the consent.

8. Right to lodge a complaint

The User shall have the right to lodge a complaint to the supervisory authority dealing with personal data protection.

9. How can the User contact the Controller and exercise its rights?

9.1. The User's request submitted to the Controller should explicitly imply the grounds for submitting such request, i.e. in particular:

- a) Which right the User is willing to exercise;

b) Which processing procedure the requests refers to.

9.2. If the Controller is not able to identify the individual submitting the request, it shall request the User for additional information.

9.3. The request can be submitted in person or through intermediary (e.g. a family member). On account of Personal Data safety, the Controller shall advise to use a power of attorney certified by a notary public or by an authorised legal counsellor or advocate, which shall materially speed up verification of authenticity of the request.

9.4. Response to the request shall be provided within a month of receiving it. If this time limit needs to be extended, the Controller shall notify the person making the request.

9.5. Response shall be given via traditional mail unless the request has been made via e-mail or electronic form is requested.

9.6. The Controller has appointed Personal Data Protection Supervisor. Should the User be willing to exercise its rights, it should contact the Controller:

a) in the event of using the Service **through the domain exactsystems.pl** and **exactsystems.com**:

- In writing to the following address: Exact Systems sp. z o.o., ul. Focha 53/5, 42-200 Częstochowa, with an annotation: Privacy Policy;
- via e-mail to the following address: **odo@exactsystems.pl**;

b) in the event of using the Service **through the domain exactsystems.cz** to the address of common contact point of Joint Controllers:

- in writing to the following address: Czech Republic S.R.O. Na Honech 832/16, 720 00 Ostrava – Hrabová, Czech Republic, with an annotation: Privacy Policy,
- via e-mail to the following address: **office@exactsystems.cz**

c) in the event of using the Service **through the domain exactsystems.sk** to the address of common contact point of Joint Controllers:

- in writing to the following address: Exact Systems Slovakia s.r.o. Jána Kalinčiaka 22, 010 01 Žilina, Slovakia, with an annotation: Privacy Policy,
- via e-mail to the following address: **office@exactsystems.sk**

d) in the event of using the Service **through the domain exactsystems.hu** to the address of common contact point of Joint Controllers:

- in writing to the following address: Exact Systems Hungary Kft. H-1146 Budapest, Hungária körút 140-144, with an annotation: Privacy Policy,
- via e-mail to the following address: **office@exactsystems.hu**

e) in the event of using the Service **through the domain exactsystems.ro** to the address of common contact point of Joint Controllers:

- in writing to the following address: Exact Systems SRL Blvd. Unirii, N. 27, Bloc 15, Sc.1, Floor 7, Apt. 19 Bucharest, Romania, with an annotation: Privacy Policy,

- via e-mail to the following address: **office@exactsystems.ro**
- f) in the event of using the Service **through the domain exactsystems.uk.com** to the address of common contact point of Joint Controllers:
- in writing to the following address: Exact Systems Ltd 2.09 Grosvenor House, Hollinswood Road, Telford, TF2 9TW, with an annotation: Privacy Policy,
 - via e-mail to the following address: **office.uk@exactsystems.com**
- g) in the event of using the Service **through the domain exactsystems.es** to the address of common contact point of Joint Controllers:
- in writing to the following address: QUALITY LIASON SERVICES AUTOMOTIVE, S.L. Poligono Industrial de Las Gandaras, n°8 36400, O Porrino Pontevedra, Spain, with an annotation: Privacy Policy,
 - via e-mail to the following address: **vigo@qls-services.com**
- h) in the event of using the Service **through the domain exactsystems.pt** to the address of common contact point of Joint Controllers:
- in writing to the following address: QLS Automotive, Lda. Parque Industrial Autoeuropa, CCI 10201 2950-557 Quinta do Anjo, with an annotation: Privacy Policy,
 - via e-mail to the following address: **palmela@qls-services.com**
- i) in the event of using the Service **through the domain exactsystems.de** to the address of common contact point of Joint Controllers:
- in writing to the following address: Exact Systems GmbH Am Klinikum 7, 02828 Görlitz, with an annotation: Privacy Policy,
 - via e-mail to the following address: **office@exactsystems.de**
- j) in the event of using the Service **through the domain exactsystems.nl** to the address of common contact point of Joint Controllers:
- in writing to the following address: Exact Systems bv Dr. Nolenslaan 157, 6136GM Sittard, Netherlands, with an annotation: Privacy Policy,
 - via e-mail to the following address: **office@exactsystems.nl**
- k) in the event of using the Service **through the domain exactsystems.be** to the address of common contact point of Joint Controllers:
- in writing to the following address: Exact Systems Belgium Hoogstraat 69, B3600 GENK, Belgium, with an annotation: Privacy Policy,
 - via e-mail to the following address: **office@exactsystems.be**
- l) in the event of using the Service **through the domain exactsystems.cn**:
- in writing with an annotation – Privacy Policy to the following address:
 - Exact Systems China Limited Mingzhu center Room 215, No. 1019 North Nanquan Road Pudong District, Shanghai PR China 200122 or

- Exact Systems sp. z o.o., ul. Focha 53/5, 42-200 Częstochowa;
 - via e-mail to the following address: **office@exactsystems.cn**

- m) in the event of using the Service **through the domain exactsystems.com.tr**:
 - in writing with an annotation – Privacy Policy to the following address:
 - Exact Systems Kalite Kontrol Ltd. Sti. Akdeniz Mah. Vali Kazim Dirik Cad. No: 32/32 K:3 Konak IZMIR/TURKEY or
 - Exact Systems sp. z o.o., ul. Focha 53/5, 42-200 Częstochowa;
 - via e-mail to the following address: **office.turkey@exactsystems.com.tr**

- n) in the event of using the Service **through the domain exactsystems.ru**:
 - in writing with an annotation – Privacy Policy to the following address:
 - CJSC Exact Systems 123007, Khoroshevskoe highway, 32A, bld. 22, office 428, Russia, Moscow or
 - Exact Systems sp. z o.o., ul. Focha 53/5, 42-200 Częstochowa;
 - via e-mail to the following address: **office@exactsystems.ru**

IV. Cookie files and other Internet technologies

The Controller shall use cookie files and other Internet technologies in order to improve the Service, facilitate its use and adjust it to the User's needs.

1. Cookies

1.1. Two basic cookie files are used in the Service:

- a) Session Cookies – temporary files, they are stored until the User logs out, leaves the website or shuts down the browser;
- b) Persistent Cookies – stored on the User's device for the period specified in the Cookies parameters until they expire or are deleted by the User;

1.2. Cookies are used to:

- a) Adjust the content on the websites of the Service to the User's preferences and optimise the use of the websites; in particular, these files enable to identify the User's device and properly display the website, adjusted to the user's individual needs;
- b) Create statistics to understand how Service Users use the websites, which enables to improve their structure and content.

1.3. The following Cookies are used in the Service:

- a) "necessary" Cookies that enable to use services available as part of the Service, e.g. authentication Cookies used in relation to services that require authentication as part of the Service;
- b) Cookies used to ensure safety, e.g. used to detect frauds in the scope of authentication as part of the Service;
- c) "efficiency" Cookies that enable to collect the information about the method of using Service websites;

d) “functional” Cookies that enable to “remember” settings selected by the User and personalisation of the User’s interface, e.g. in the scope of a given language or region of the User’s origin, font size, design of the website etc.

1.4. In many cases software used to browse the websites (Internet browser) by default enables to store Cookies in the User’s device. The User gives consent to accept Cookies by changing settings of the browser that enable processing of Cookies or by giving consent in the relevant “window” in the Service. Service Users can change at any time settings concerning Cookies. Settings can be changed in particular in order for the Cookies to be automatically blocked in the settings of the browser or to inform each time about Cookies being stored in the User’s device. Detailed information concerning possibilities and methods of handling Cookies are available in the software settings (Internet browser), e.g. in the following browsers:

- a) Microsoft Internet Explorer,
- b) Mozilla Firefox,
- c) Google Chrome,
- d) Safari,
- e) Opera.

1.5. Please be informed that limited use of Cookies can affect convenience of use of the Service, hinder the use of some part of the Service or Services, or disturb the information for the User to be displayed. First of all, however, it will make it impossible for the Controller to obtain anonymous statistical information used to improve the Service.

2. Other Internet technologies

2.1. In order to conduct marketing and remarketing activities, the Controller uses the following Internet technologies tracing activities taken by the Users as part of the Service:

- a) Mautic – the Controller uses Mautic the aim of which is to provide anonymous information on the Users’ activity in the Service in order to precisely adjust and monitor advertisements;
- b) SMS API – the Controller uses SMS API that enables to send shot messages to the Users who have ordered such correspondence by subscribing the list and giving relevant contact details;
- c) FreshMail – the Controller uses FreshMail that enables the Controller to send e-mails to the Users who have ordered such correspondence by subscribing the list;
- d) Facebook Conversion Pixel – Facebook Pixel uses Cookies technology, i.e. text files put in the User’s device, in order to enable the Controller to analyse sources of move and methods of using it. Pixel Facebook collects on its servers data obtained from Cookies in the device and uses such information for the purpose of preparing reports and rendering other services connected with move and use of the Internet. Pixel Facebook can also transfer such information to third parties if so required in accordance with the law or if such parties process such information on behalf of Facebook. These data are never combined with data provided by the User and are only used for the purpose of making statistical analyses and mechanisms correcting system errors.

- e) Google AdWords – Google AdWords uses Cookies to improve correctness and efficiency of advertising activity with the use of AdWords. Google collects on its servers data obtained from Cookies in the device and uses such information for the purpose of preparing reports and rendering other services connected with move and use of the Internet. It can also transfer such information to third parties if so required in accordance with the law or if such parties process such information on behalf of Google. These data are never combined with data provided by the User and are only used for the purpose of making statistical analyses and mechanisms correcting system errors.
 - f) Google Analytics – Google Analytics uses Cookies technology, i.e. text files put in the User's device, in order to enable the Controller to analyse sources of move and methods of using it. Google collects on its servers data obtained from Cookies in the device and uses such information for the purpose of preparing reports and rendering other services connected with move and use of the Internet. It can also transfer such information to third parties if so required in accordance with the law or if such parties process such information on behalf of Google. These data are never combined with data provided by the User and are only used for the purpose of making statistical analyses and mechanisms correcting system errors.
 - g) Web Storage – these files and technologies are used to collect anonymous statistics and for the purpose of adjusting the Service to the Users' needs, as well as for advertising purposes. Cooperating advertisers, research companies and other entities can also use them.
 - h) Links and plugins to social media – the Service enables to use social media plugins, e.g. Facebook, Instagram, YouTube (e.g. "Like," "Share"), marked with common icons. To his effect, there is a code referring to the aforementioned media. The content of the Service can be sent to such website or service. Depending on default settings of these websites or privacy settings of the User (depending on the functionality of the website), it can be public or private (e.g. to be seen only by friends, followers or for everyone accessing the User's profile). There are also external links in the Service, e.g. to the Controller's profile on Facebook, LinkedIn, Instagram or our YouTube channel. Using such links, the User leaves the website. The Controller has no control on the type of data gathered by the supplier of plugins or social media sites, and on how it processes such data. In order to obtain the information on the purpose and scope of collecting data, including cookie files used therein, on further processing and use by external advisors and the rights to which the Users are entitled as well as options of privacy settings, the User has to read the information concerning data protection with respect of a given supplier.
- 2.2. The User gives consent to use other Internet technologies is given by the User by way of marking the relevant "window" in the Service.

V. Changes in Privacy Policy

Personal Data Controller represents that this Privacy Policy is verified on a regular basis and updated, if necessary. The current version of Privacy Policy takes effect as of 07.06.2019 r.

Should a need arise, the Controller can modify and supplement Privacy Policy. The Users shall be notified of any changes or supplementations as part of the Service.