## Data privacy policy at Hoopify S.A.

This Privacy Policy applies to the rules of use of the website https://hoopify.pl (hereinafter: the Website) and the processing of personal data in connection with Hoopify S.A.'s business activities.

#### I. General Information

- This policy applies to the Website, operating under the url: HOOPIFY SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ.
- The operator of the service and the Administrator of personal data is:
   HOOPIFY SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ UL. NOWY
   ŚWIAT 54 /56, 00-363 WARSAW
- 3. Operator's email contact address: hello@hoopify.co
- 4. The Operator is the Administrator of your personal data with respect to the data you voluntarily provide on the Website.
- 5. The Service uses personal data for the following purposes:
  - a. Running a newsletter
  - b. Handling inquiries via form
  - c. Fulfillment of ordered services
  - d. Presentation of an offer or information
- 6. The service performs functions of obtaining information about users and their behavior in the following ways:
  - a. Through voluntarily entered data in the forms, which are entered into the Operator's systems.

 Through the storage of cookies (so-called "cookies") on end devices.

## II. Selected data protection methods used by the Operator

- The login and personal data entry sites are protected in the transmission layer (SSL certificate). This ensures that the personal and login data entered on the site are encrypted on the user's computer and can only be read on the target server.
- 2. The personal data stored in the database are encrypted in such a way that only those holding the Operator key can read them. This protects the data in case the database is stolen from the server.
- User passwords are stored in hashed form. The hashing function works
   one-way it is not possible to reverse it, which is now the modern standard for
   storing user passwords.
- 4. The Service uses two-factor authentication, which is an additional form of protection for logging into the Service.
- 5. The Operator periodically changes its administrative passwords.
- 6. In order to protect data, the Operator regularly makes security copies.
- 7. An important element of data protection is the regular updating of all software used by the Operator to process personal data, which in particular means regular updates of software components.

# III. Hosting

- The service is hosted (technically maintained) on the servers of the operator:
   another company
- 2. The hosting company, in order to ensure technical reliability, keeps logs at the server level. The record may be subject to:
  - a. resources specified by the URL identifier (addresses of the requested resources - pages, files),
  - b. time of arrival of the request,
  - c. time of sending the response,
  - d. the name of the client station identification carried out by the HTTP protocol,
  - e. information about errors that occurred during the execution of HTTP transactions,
  - f. URL address of the page previously visited by the user (referer link)- in case the passage to the Site occurred through a link,
  - g. information about the user's browser,
  - h. information about the IP address,
  - diagnostic information related to the process of self-ordering of services through registrars on the site,
  - j. information related to the handling of e-mails addressed to the
     Operator and sent by the Operator.

### VI. Your rights and additional information about how your data is used

 In certain situations, the Administrator has the right to transfer your personal data to other recipients, if this is necessary to perform the contract concluded with you or to fulfill the obligations incumbent on the Administrator. This applies to such groups of recipients:

- a. hosting company on a trust basis
- b. postal operators
- c. authorized employees and associates who use the data to fulfill the purpose of the site's operation
- d. companies, providing marketing services to the Administrator
- Your personal data processed by the Administrator for no longer than it is
  necessary to perform related activities specified by separate regulations (e.g.,
  on accounting). With regard to marketing data, data will not be processed for
  longer than 3 years.
- 3. You have the right to request from the Administrator:
  - a. access to personal data concerning you,
  - b. their rectification,
  - c. deletion,
  - d. limitation of processing,
  - e. and data portability.
- 4. You have the right to object, with respect to the processing indicated in Section 3.2, to the processing of your personal data for the purpose of carrying out the legitimate interests pursued by the Controller, including profiling, whereby the right to object will not be exercised if there are valid legitimate grounds for the processing that override your interests, rights and freedoms, in particular the establishment, assertion or defense of claims.
- 5. The Administrator's actions may be complained about to the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw.

- 6. Providing personal data is voluntary, but necessary to operate the Service.
- 7. Automated decision-making, including profiling for the purpose of providing services under a concluded agreement and for the purpose of direct marketing by the Administrator, may be undertaken in relation to you.
- Personal data is not transferred from third countries in terms of data protection regulations. This means that we do not send them outside the European Union.

#### V. Information in forms

- The Service collects information voluntarily provided by the user, including personal information, if provided.
- The Service may record information about connection parameters (time stamp, IP address).
- 3. The Service, in some cases, may record information to facilitate linking the data in the form to the e-mail address of the user filling out the form. In this case, the e-mail address of the user appears inside the url of the page containing the form.
- 4. The data provided in the form is processed for the purpose resulting from the function of the specific form, e.g. to perform the process of service request or business contact, registration of services, etc. Each time the context and description of the form clearly informs what it is used for.

### **VI. Administrator Logs**

 Information of users' behavior on the site may be subject to logging. This data is used to administer the site.

# VII.Relevant marketing techniques

- 1. The operator uses statistical analysis of website traffic, through Google Analytics (Google Inc., based in the USA). The operator does not transmit personal data to the operator of this service, only anonymized information. The service is based on the use of cookies on the user's terminal device. Regarding the information about the user's preferences collected by the Google advertising network, the user can view and edit the information resulting from the cookies using the tool: https://www.google.com/ads/preferences/
- 2. The Operator uses remarketing techniques to match advertising messages to the user's behavior on the site, which may give the illusion that the user's personal information is being used to track the user, but in practice no personal information is transferred from the Operator to advertising operators. A technological prerequisite for such activities is that cookies are enabled.
- 3. The Operator uses a solution that automates the operation of the Website with respect to users, e.g., that can send an email to a user after visiting a specific subpage, provided that the user has agreed to receive commercial correspondence from the Operator.

#### VIII. Information about cookies

1. The Website uses cookies.

- 2. Cookies (so-called "cookies") are IT data, in particular text files, which are stored in the Service User's terminal equipment and are intended for use on the Service's websites. Cookies usually contain the name of the website they come from, the time they are stored on the terminal equipment and a unique number.
- The entity placing cookies on the Service User's terminal equipment and accessing them is the Service operator.
- 4. Cookies are used for the following purposes:
  - a. maintaining a session of the Service user (after logging in), thanks to which the user does not have to re-enter his/her login and password on each sub-page of the Service;
  - to carry out the purposes specified above under "Important marketing techniques";
- 5. The Service uses two main types of cookies: "session" (session cookies) and 'permanent' (persistent cookies). "Session" cookies are temporary files that are stored on the User's terminal equipment until the User logs out, leaves the website or shuts down the software (web browser). "Permanent" cookies are stored on the User's end device for the time specified in the parameters of the cookies or until they are deleted by the User.
- 6. Web browsing software (Internet browser) usually allows the storage of cookies on the User's terminal device by default. Users of the Website may change their settings in this regard. The web browser makes it possible to delete cookies. It is also possible to automatically block cookies Detailed information on this subject is contained in the help or documentation of the Internet browser.

- 7. Restrictions on the use of cookies may affect some functionalities available on the Website.
- 8. Cookies placed on the Website User's terminal equipment may also be used by entities cooperating with the Website Operator, in particular this concerns companies: Google (Google Inc. based in the USA), Facebook (Facebook Inc. based in the USA), Twitter (Twitter Inc. based in the USA).

## IX. Managing cookies - how to give and revoke consent in practice?

- If you do not wish to receive cookies, you can change your browser settings.
   We stipulate that disabling cookies necessary for authentication processes, security, maintenance of user preferences may hinder, and in extreme cases may make it impossible to use the websites
- 2. To manage your cookie settings, select the web browser you are using from the list below and follow the instructions:
  - a. <u>Edge</u>
  - b. Internet Explorer
  - c. Chrome
  - d. <u>Safari</u>
  - e. Firefox
  - f. Opera

### Mobile devices:

- g. Android
- h. Safari (iOS)
- i. Windows Phone