## PRIVACY POLICY OF ADVISIO POLAND

This Privacy Policy establish the terms on which **ADVISIO POLAND Sp. z o.o.** with its registered office in Jasionka at Jasionka 954E, 36-002 Jasionka **NIP: 113 260 74 76,** (hereinafter referred to as "**ADVISIO**") collects data of Users of the Website available at **https//www.way2select.com** (hereinafter referred to as "Website").

## I. PERSONAL DATA

- 1. Personal data provided by Users within the frames of the Website are process by , the Personal Data Controller, in accordance with the terms prescribed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as "GDPR"). The Data Controller is available via e-mail at office@way2select.com.
- 2. The scope of processed data is determined by the contact form completed by the User, which is sent to ADVISIO and includes the e-mail address, name of the User and additionally, the computer IP address. Personal data of Users, upon prior consent of the User, may be used for contact with Users and may be shared with third-party entities for the purpose of sending newsletter and displaying advertisements.
- 3. Personal data of the Website Users will be processed for the following purposes: (a) provision of services by electronic means, (b) promotional or marketing actions of ADVISIO.
- 4. Personal data of Users will be processed for the period of 5 years and will be deleted upon the lapse of the said period, unless their processing results from another legal basis.
- 5. The legal basis of processing within the website is consent of the person to whom the processing refers.
- 6. Personal Data of Clients and Users may be transferred for processing to (recipients of personal data): ADVISIO accounting firm, the provider of hosting for the Website, the company providing technical support for the Website, the payment provider, the company providing the CRM system. The personal data collected by ADVISIO may also be disclosed to: competent state authorities upon their request on the basis of relevant provisions of law or other persons and entities—in the cases prescribed in the provisions of law. The entity processing Users' personal data on the basis of the Transfer Agreement will process User personal data from the effective date of GDPR through another entity only upon prior consent of ADVISIO.
- 7. ADVISIO may disclose User's personal data to other entities only upon User's prior consent.
- 8. The User has the right to: remove the collected personal data referring to him/her both from the ADVISIO system and from bases of entities which have co-operated with Conversion, to restrict the processing of data and the right to portability of the personal data collected by ADVISIO and referring to the User and to receive them in a structured form, to file a complaint to the supervisory authority if the User finds that his/her data are processed in violation of the law, and to seek legal remedies before a court against the supervisory authority as the entity committing the violation.
- 9. Transfer of personal data to third countries there is not used.

## II INFORMATION SECURITY

1. ADVISIO additionally applies within the Website all necessary technical measures as specified in Articles 25, 30, 32–34, 35–39 of GDPR, providing for enhanced protection and security of the processing of Clients' personal data.

2. The use of the Website proceeds in secure https connection. The communication between a User's device and the servers is encoded by means of the SSL protocol.

## III. COOKIES

- 1. The Website does not collect in an automated manner any information, except for information contained in Cookie files.
- Cookies constitute IT data, in particular text files, which are stored in the device of the Website
  User and are designed for use of the Website pages. Cookies usually contain name of the site
  from which they are derived, a period for which they are stored on the device and a unique IP
  number.
- 3. The Website operator—ADVISIO—is the entity placing cookies in the Website User's device and gaining access to them.
- 4. Cookie files are used for the following purposes: a) adjustment of the content of the Website pages to User's preferences and optimisation of the use of sites; in particular such files enable recognising Website User's device and correctly displaying the site adjusted to his/her individual needs; b) preparation of statistics which help to understand how the Website Users use sites, which enable improving their structure and content; c) preparation of recipients list and displaying advertisements adjusted to their needs and interests.
- 5. Within the Website two basic types of cookies are used: session and persistent cookies. Session cookies are temporary files stored on the User's device until logging out, leaving a site or shutting down the software (the browser). Persistent cookies are stored on the User's device for a time prescribed in the parameters of the cookie files or until they are removed by the User upon User's consent.

Within the Website the following types of cookies are used:

- a) essential cookies enabling the use of services available within the Website, e.g. authenticating cookies used for services requiring authentication within the Website;
- b) cookies designed to provide for security, e.g. used to detect abuses in the scope of authentication within the Website;
- c) performance cookies enabling the collection of information on the manner in which the Website pages are used;
- d) functional cookies enabling to remember User's settings and to personalise User's interface, e.g. in terms of a selected language or region from which the User comes, the font size, page layout etc.;
- e) advertising cookies, which are created by third-party companies (such as AdRoll). They enable provision of advertising content to Users while they visit other websites which fits their interests more, insofar as the User consents to this through settings of his/her browser.
- 7. In many cases software designed to browse sites (a browser) allows for storing cookies on the User's device, insofar as the User selects such option in the browser settings. The Website Users may at any time change the settings related to cookies. Such settings may be changed in particular so as to block the automatic cookie support in the browser settings or to notify on each case of placing them on the Website User's device. Detailed information on possibilities and methods of cookie support is available in the software (browser) settings.

8. Cookies placed on the Website User's device may also be used by advertisers and partners co-operating with the Website operator upon prior User's consent given in the browser settings. In accordance with the e-Privacy Regulation, the User may enable the storing of third-party cookies on his/her device in line with the instructions of the browser producer. Failure to enable third-party cookies and cookies other than session cookies not may cause lack of availability of the Website, in part or in its entirety, for the User.