

## PRIVACY POLICY

### General provisions

This Privacy Policy set the rules of processing your personal data obtained through our websites: <https://trasee.io/>, <https://gallio.pro/>, <https://kidspriv.com/> (the "**Websites**"), inter alia, it contains information about the controller of your personal data, the scope, purpose and period of data processing, as well as information about your rights and the third parties to which we may share your personal data.

### Personal data controller

The controller of your personal data obtained through the Websites is "**TRASEE**" sp. z o.o. with its registered office in Wrocław (50-344) at the address: ul. Gdańska 13/210, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna in Wrocław, VI Commercial Department of the National Court Register under the number KRS: 0000782989, having the numbers NIP: 8982250026 and REGON: 38314964 (the "**Controller**").

In all matters relating to the processing of your personal data, you can contact us by e-mail: [rodo@trasee.io](mailto:rodo@trasee.io) or in writing to the following address: "TRASEE" sp. z o.o. ul. Gdańska 13/210, 50-344 Wrocław.

### Information we may collect from you

We may collect and process the following data about you:

- 1) information that you provide by filling in any of the forms available on the Websites. This includes information provided such as your name, email address, telephone number, as well as other data that you provide by filling relevant form;
- 2) if you contact us, we may keep a record of that correspondence;
- 3) details of your visits to our Websites, including, but not limited to, traffic data, your location, contact details, weblogs and other communication data and the resources that you access.

### Purposes, basis and period of processing of your personal data

We process your personal data obtained through the Websites, mainly using forms available on the Websites and to the extent resulting from them for the following purposes:

- 1) in order to **fulfil your request for contact or to present to you our offer**:
  - a) pursuant to Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as '**GDPR**'),
  - b) in this case we process your personal until your consent is revoked;
- 2) to **perform a contract** to which you are a party in connection with the purchase of our product or to cooperate with us, or to take action at your request, before concluding a contract with us:
  - a) pursuant to Article 6(1)(b) of the GDPR,

- b) in such a case your personal data is processed by us as long as it is necessary for the performance of the contract, and after that time for a period corresponding to the statute of limitations for possible claims on this account;
- 3) **for marketing purposes**, in particular to sent you our newsletter, which is necessary for the purposes of compelling legitimate interest pursued by the Controller:
  - a) pursuant to Article 6(1)(f) of the GDPR,
  - b) in such a case your personal data is processed by us until you object to such processing,
  - c) provided however, that we send you such materials on the basis of your consent to receive information about offer and products by electronic means;
- 4) in order to **examine your satisfaction** and for **statistical purposes** for our internal needs, which is necessary for the purposes of compelling legitimate interest pursued by the Controller:
  - a) pursuant to Article 6(1)(f) of the GDPR,
  - b) in such a case, personal data is processed by the us until you object to such processing;
- 5) for **archival (evidential) purposes**, including for the purpose and to the extent necessary to establish, assert or defend our claims related to the use of the Websites, which is necessary for the purposes of compelling legitimate interest pursued by the Controller:
  - a) pursuant to Article 6(1)(f) of the GDPR,
  - b) in such a case your personal data is processed by us until you object to such processing;
- 6) we also process your data **if it is required by law**, e.g., for tax and accounting purposes:
  - a) pursuant to Article 6(1)(c) GDPR
  - b) in such a case your personal data is processed by us as long as it is required by applicable law.

In addition, where the processing of your personal data is based on your consent or our legitimate interest, despite a request to delete the personal data, in connection with raising an objection or withdrawing consent, we may retain your certain personal data to the extent that the processing is necessary to establish, assert or defend claims, and until their expiration date.

### **Your rights in connection with data processing**

Using the Websites and providing your personal data by filling in any of the forms on the Websites is voluntary, but necessary to fulfil your request to contact you or to receive our offer, as well as necessary to enable you to use our services.

In connection with the processing of your personal data by us, you have the following rights:

- 1) the right to access your personal data, including obtaining a copy of your personal data,

- 2) the right to rectification of personal data,
- 3) the right to erasure your personal data (the right to be forgotten),
- 4) the right to make a complaint to the supervisory body for personal data protection, which is the President of the Office for Personal Data Protection in Poland,
- 5) the right to restriction of processing of your personal,
- 6) the right to object (object to processing, object to direct marketing).

In case your personal data is processed on the basis of your consent or for the purpose of the contract you also have the right to transfer your personal data.

In addition, where your personal data is processed based on your consent, you have the right to withdraw your consent at any time, but the withdrawal of your consent does not affect the lawfulness of the processing carried out while we held such consent.

In order to exercise the aforementioned rights, please contact us by e-mail: [rodo@trasee.io](mailto:rodo@trasee.io) or in writing to the following address: "TRASEE" sp. z o.o. ul. Gdańska 13/210, 50-344 Wrocław.

### **Data recipients**

We do not share your personal data collected through the Websites with third parties unless we have your consent to do so, with the exception of our verified affiliates and partners to whom we may entrust your personal data for the proper execution of your contact request and the conclusion and execution of the contract, as well as service providers for the operation and maintenance of the Websites.

Your personal data will be processed only to the extent necessary, allowed for the purposes of processing and in accordance with the applicable legislation on the protection of personal data, including GDPR. Each recipient will be responsible for ensuring adequate protection of your personal data.

### **Data recipients with their registered office outside the EEA**

If we decide to transfer your personal data to our partners not located in the EEA, we will take all measures to ensure adequate protection of your personal data and will only transfer your personal data to third parties that guarantee an adequate level of data protection, resulting in particular from the commitment to apply the standard contractual clauses adopted by the Commission (EU) to the provisions of Article 46(2) of the GDPR.

The right of access of these third parties will be strictly limited in such a way that their access will be possible only to the extent necessary for the purpose of establishing contact or cooperation with you or concluding and properly executing the contract.

### **Automated decision making**

We do not make automated decision, including profiling based on provided personal data.

### **Security**

We have implemented solutions to ensure a high level of protection of your personal data, including an SSL certificate, an IT system of the Websites which meets high standards of personal data protection.

### **Cookies**

When you browse the Websites, one or more cookies may be stored on your device (terminal device) by us or our partner company (our subcontractor), depending on your consent and browser configuration. Please read the following information about cookies and how they are used.

Cookies are small files that are placed on your computer's hard drive when you visit some websites. They contain information about your device and usually do not contain any personal data. These files cannot be used to infect your device with viruses or other malware.

In cookies we store basic, anonymous information about users (e.g., identifier) and data to increase the comfort of using the Websites, needed to optimize and correctly display the content of the pages and advertising campaigns.

Cookies are installed for different periods. Some of them expire when you close your browser, others are active for a few days, months or even years, mainly so that information about your choices is not lost. Long-term active cookies are used to help us identify new and returning Websites users.

As a Websites user, you may stop providing this information to the Websites at any time by deleting the cookies stored on your device and downloaded via the Websites. To do so, you must change the settings of your current web browser.

It is also possible to configure your browser in a way that will block the installation of cookies for specific websites of your choice or for all websites. However, such settings will result in the loss of some Websites features that require the installation of cookies.

### **Final provisions**

We reserve the right to change this Privacy Policy, in particular due to changes of the applicable law, technology or the way the Websites operates. The current text of the Privacy Policy is always available on the Websites.

If any provision of the Privacy Policy is declared invalid by a final court decision, the remaining provisions of the Policy remain in force.

The Privacy Policy shall be governed by and interpreted in accordance with the provisions of Polish law.