work'n'roll PP v1

Work'n'Roll Platform PRIVACY POLICY

EXPLANATIONS OF ABBREVIATIONS

Capitalised names have the meaning given to them in paragraph "Definitions we use in the Terms and Conditions" of the Terms and Conditions for Work'n'Roll Platform.

You - an individual whose personal data is processed in connection with the use of Our website, mobile app, social media profile or Our Services i.e using the Platform.

GDPR - 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 (General Data Protection Regulation).

We - WORK N ROLL SP. z O.O. (referred to as "Work n roll" Company) with its registered office in Marsz. Józefa Piłsudskiego 74 / 320, 50-020 Wroclaw, Poland, registered with the National Court Register under number 0000930234.

CONTROLLER OF THE PLATFORM	"Work n roll" Company controls the Work'n'Roll Platform, worknroll.pro, cabinet.worknroll.pro web and Work'n'Roll mobile applications. This means that your personal data processed in your User's Profile is controlled by: WORK N ROLL SP. z O.O. (referred to as "Work n roll" Company) with its registered office in Marsz. Józefa Piłsudskiego 74 / 320, 50-020 Wroclaw, Poland, registered with the National Court Register under number 0000930234.
	"Work n roll" Company is obliged to fulfill its own information obligation and to respond to requests concerning the processing of personal data. You can obtain information about the processing of your personal data and the principles of the control of personal data by contacting Us via e-mail: sales@worknroll.pro (the above company hereinafter referred to as "We", "Us", "Our").
CONTROLLER OF THE SERVICES PROVIDED ON THE PLATFORM	"Work n roll" Company provides their own Services through the Platform, acting as a controller of your personal data in this regard.
CONTACT DETAILS OF CONTROLLER	You can contact Us via email address: <u>sales@worknroll.pro</u> or in writing at Our address: Poland, Wrocław, Marsz J. Piłsudskiego 74 office 320, 50-020

CONTACT DETAILS OF THE PERSONAL DATA PROTECTION OFFICER

"Work n roll" Company has appointed a Data
Protection Officer. This is the person you can contact
for all matters concerning the processing of your
personal data and the exercise of your rights in
relation to data processing. You can contact the Data
Protection Officer via email address:
sales@worknroll.pro

OBJECTIVES AND LEGAL BASIS OF PERSONAL DATA PROCESSING

If you use Work'n'Roll Platform, worknroll.pro, cabinet.worknroll.pro web and Work'n'Roll mobile applications, including the Profile, your personal data is processed:

- in order to provide services electronically in terms of providing access to the content collected on the Platform the legal basis for the processing is the necessity of the processing for the performance of the Agreement (Article 6(1)(b) of the GDPR);
- in order to respond to your **correspondence** the legal basis of the processing is the pursuit of Our legitimate interest (Article 6(1)(f) of the GDPR); where Our legitimate interest is to carry out the correspondence;
- in order to maintain and operate your **Profile provided via the Platform** the legal basis for the

 processing is the necessity of the processing in order

 to conclude and perform the Agreement (Article 6(1)

 (b) of the GDPR);
- in order to enter into the Agreement for the provision of the Service and to perform Our obligations under that Agreement, including the handling of complaints the legal basis is that the processing is the necessity of the processing in order to take steps before entering into the Agreement and for the performance of the Agreement (Article 6(1)(b) of the GDPR);
- to produce reports, compilations, and analyses and to ensure the smooth functioning of the Platform the legal basis for the processing is the pursuit of Our legitimate interest (Article 6(1)(f) of the GDPR); where Our legitimate interest is the maintenance of the smooth functioning of the Platform;
- in order to prevent abuse and to clarify the circumstances of unauthorized use of the electronically provided Services the legal basis is the pursuit of Our legitimate interest Article 6(1)(f) of the GDPR); where Our legitimate interest is the maintenance of the smooth functioning of the Platform and preventing inappropriate use of the Platform;

• in order to carry out **direct marketing** of Our own products and Services - the legal basis is the pursuit of Our legitimate interest to carry out direct marketing activities (Article 6(1)(f) of the GDPR), with the reservation that the sending of commercial and marketing information by Us using telecommunications terminal equipment, automatic calling systems or electronic communication means (SMS, e-mail, telephone contact) is only possible with Your consent (Article 6(1)(a) of the GDPR), granting of this consent is voluntary, although necessary for the sending of commercial and marketing information.

If you use Our **website** and **mobile applications**, Your personal data is processed:

- to provide you with the functionality of the website and to maintain your connection the legal basis is the pursuit of Our legitimate interest (Article 6(1)(f) of the GDPR); where Our legitimate interest is to operate the website and provide you with access to the content you have requested and to promote Our business;
- for statistical purposes, including market analyses and opinion surveys carried out to improve the quality of the Services provided by Us the legal basis is the pursuit of Our legitimate interest (Article 6(1)(f) of the GDPR), where Our legitimate interest is to adapt Our offering to market expectations;
- to carry out marketing activities, including the adaptation of the content of the advertisements presented the legal basis is the pursuit of Our legitimate interest (Article 6(1)(f) of the GDPR), where Our legitimate interest is to display the content you have requested, with such activities only being possible if you have consented to the use of cookies and similar mechanisms.

If you interact with Our **profiles on social networks**, Your personal data is processed:

• in order to maintain a profile and provide access to information shared by Us on social media, as well as to carry out marketing activities on these sites - the legal basis is Our legitimate interest is to maintain a profile and provide access to the content you have requested and to promote Our activities (Article 6(1)(f) of the GDPR).

In **any of the above cases**, your personal data may also be processed:

- in order to comply with Our legal obligations, including tax law, accounting law and financial reporting law the legal basis is the necessity to comply with legal obligations (Article 6(1)(c) of the GDPR);
- for the purpose of **establishing, investigating, or defending against claims** the legal basis is the necessity of the processing for the performance of the Agreement (Article 6(1)(b) of the GDPR) or the pursuit of Our legitimate interest to exercise Our rights (Article 6(1)(f) of the GDPR);
- for other purposes for which you have given your consent; if We ask you to consent to the processing of your personal data and you give Us such consent the legal basis for processing is your consent (Article 6(1)(a) of the GDPR). The provision of data and the granting of consent in such cases is voluntary, although it may be necessary to fulfill the purpose of the processing.

AUTOMATED DECISIONMAKING

N/A

RECIPIENTS OF THE DATA

Your personal data may be disclosed to entities that support Our operations, i.e.:

- service providers and suppliers of IT systems, including the IT devices on which the data are processed, law and tax offices, postal and courier companies, server providers, including the companies that operate these servers, debt collection companies, technology providers, accountants, entities engaged in the destruction of data media, etc,
- to **Our affiliated entities**, including entities from the same group of companies.

Moreover, your data may also be shared with other parties when:

- the obligation to transmit them arises by law,
- it is Our legitimate interest or that of a third party,
- you give Us your voluntary consent to do so.

We will ensure on a case-by-case basis that the extent of the information disclosed to these entities is adequate and necessary to meet the stated objectives.

RECIPIENTS OF DATA OUTSIDE THE EEA

Your personal data may also be transferred to other recipients outside the European Economic Area (EEA). In order to provide appropriate safeguards and protect your rights, We ensure that personal data will be transferred outside the FEA on the basis of:

- a decision of the European Commission stating that the country of the data recipient ensures an adequate level of protection of personal data;
- standard data protection clauses (so-called standard contractual clauses) adopted by the European Commission;
- binding corporate rules where the transfer is made by recipients who are members of international groups.

The decisions of the European Commission are available at FUR-Lex—Acc less to European Union law—choose your language]. For a copy of the standard contractual clauses, please contact Us. For a copy of the binding corporate rules, please contact the entities that are party to them.

We will always inform You of Our intention to transfer your personal data outside the EEA at the stage of collection.

TYPE AND SOURCE OF PERSONAL DATA

We obtain your personal data **directly from you** through the information you voluntarily enter in the forms, e.g. by registering a Profile on the Platform, logging in to the Platform, using the Services, as well as by contacting Us directly, e.g. by sending an email or by telephone.

In certain situations, We will obtain your data from **publicly available sources** (contact data).

When you register an account on the Platform, We will process your email address, telephone number, and country of residence.

When you contact Us to obtain the information you have requested, We will collect your name and contact details. The contact details you provide may also be used for marketing purposes, based on your consent. In addition, when using the Platform, We collect your data on your activity through cookies. In particular, information on the number (including IP) and the type of terminal device from which you connect to the website appears in the system logs of the website.

In order to use the Services, We will process your personal data such as your telephone number, email address, name, surname, date of birth, place of birth, nationality, country of residence, gender, address, type of identity card, identity card number, country of issue of identity card, date of issue and validity of identity card, payment card details.

PERIOD STORAGE DATA

Your personal data will be processed for the following period:

- data processed in order to provide you with the functionality of the website and maintain the connection - for the duration of the connection;
- data processed in order for Us to perform Our obligations under an Agreement for the provision of Services - for the period necessary for the conclusion and performance of the Agreement 4 concluded with You;
- data processed for the purpose of establishing, investigating or defending claims - for the period relevant to the limitation period of the claim;
- data processed for accounting and taxation purposes - for a period of no less than 5 years, with specific periods defined by law, e.g. tax legislation;
- data processed on the basis of the pursuit of Our legitimate interests - until the fulfillment of the legitimate interests giving rise to that processing or until you object to such processing.

In the situation of processing on the basis of consent, the processing will take place no longer than until you withdraw your consent, or until the purpose of the processing is completely fulfilled (where possible).

YOUR RIGHTS IN RELATION TO DATA PROCESSING

You have the right to request from Us: access to your personal data, rectification of your personal data, erasure of your personal data, restriction of processing of your personal data, as well as the right to object to personal data processing and the right to data portability.

If We process your personal data on the basis of your consent - you have the right to withdraw it at any time. You can withdraw your consent by email at sales@worknroll.pro. Withdrawal of consent does not affect the lawfulness of the processing of your data prior to the moment of withdrawal, nor to the extent that We process your personal data on another basis for processing (e.g. to comply with Our legal obligations).

In addition, you have the right to object at any time on grounds relating to your particular situation - to the processing of your personal data if the basis is the so-called legitimate purpose clause (Article 6(1) (f) of the GDPR) or the public interest (Article 6(1)(e)

	of the GDPR) including profiling, on the basis of these provisions. In such circumstances, We will not process your data on this basis within the scope of your objection. We have the legal right to refuse this request if there are compelling legitimate grounds on Our side for further processing overriding your interests, rights and freedoms or grounds for establishing, pursuing or defending claims. If your personal data is processed for direct marketing purposes, you may object at any time to the processing of your data for such purposes. Once such a request has been accepted, We will no longer process your data for direct marketing purposes.
	You can also manage the consent you have given for the processing of your personal data on the Platform under the Profile module.
THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY	You also have the right to lodge a complaint with the data protection supervisory authority in the Member State of your habitual residence, place of work, or the place where the alleged breach was committed. In Poland, the competent supervisory authority is the President of the Office for Personal Data Protection (Stawki 2, 00-193 Warsaw, phone no 22 531-03-00).
INFORMATION ON THE FREEDOM OR OBLIGATION TO PROVIDE DATA	The provision of personal data is voluntary; however, the refusal to provide data that We have marked as required may prevent Us from providing the Service or taking the requested action (e.g. the provision of the Service, the processing of a complaint).
SECURITY OF YOUR PERSONAL DATA	Your personal data is processed in accordance with Our procedures and recommendations, developed in accordance with the relevant legislation - including the GDPR, the Data Protection Act, the Electronic Services Act.
CHANGES TO THE PRIVACY POLICY	This Privacy Policy may be updated as necessary. Changes to the Privacy Policy will be announced on the Platform.
COOKIES	We use cookies on Our website. The cookie policy can be found at this link https://worknroll.pro, cabinet.worknroll.pro/cookie_en.pdf? title=Cookies%File%Policy