



LIQUIZEN PLATFORM PRIVACY POLICY

This Privacy Policy supplements the Terms and Conditions of the LiquiZen Platform (the "Terms and Conditions") and sets out the rules for the processing and protection of personal data provided by Users and of Cookies and other technologies appearing on the website <https://app.liquizen.com>. Definitions of terms used in this Privacy Policy are provided in the Terms and Conditions. The provisions of the Regulations shall apply accordingly. Your use of the <https://app.liquizen.com> website constitutes your acceptance of the following terms of the Privacy Policy. As a User, please familiarise yourself with its provisions.

This policy is for information purposes and fulfils the information obligations imposed on the controller under 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, hereinafter: "GDPR") and the Act of 10 May 2018 on the protection of personal data (Journal of Laws 2018, item 1000, hereinafter: "Act").

I. PERSONAL DATA CONTROLLER

The administrator of the website and personal data provided within it is the Service Provider - SMEABILITY spółka z ograniczoną odpowiedzialnością based in Stalowa Wola, Eugeniusza Kwiatkowskiego 9, 37-450 Stalowa Wola, entered in the Register of Entrepreneurs of the National Court Register by the District Court Lublin - Wschód in Lublin, based in Świdnik, 6th Commercial Division of the National Court Register, under KRS no.: 0000864666, holder of REGON no.: 387274690, NIP no.: 7162830764, initial capital in the amount of PLN 5000.00 - the owner of the LIQUIZEN Platform, represented by Kinga Regulska-Hofses - President of the Board.

If you have any doubts about the provisions of this Privacy Policy, please contact the Administrator via email address: help@liquizen.com

The Administrator reserves the right to make changes to this Privacy Policy. Each User of the <https://app.liquizen.com> website should become familiar with the current content of the Privacy Policy. Changes to the Privacy Policy may be related to with the development of Internet technology, changes in applicable law or with modifications of the Platform.

II. PERSONAL DATA AND PROCESSING RULES

1. The provision of data by the User is voluntary; however, failure to provide certain information, generally described on the Administrator's website as compulsory, results in the impossibility of performing the Service and achieving the specific purpose for which the use of the Platform is intended.
2. The provision by the User of data that is not mandatory or of excess data that the Administrator does not need to process occurs on the basis of a decision by the User himself, in which case the processing takes place on the basis of the premise contained in Article 6(1)(a) RODO (consent). The User gives his or her consent to the processing of this data and to the anonymisation of data that the Administrator does not require and does not want to process, but the User has nevertheless provided to the Administrator.

III. PURPOSES AND LEGAL BASES FOR PROCESSING PERSONAL DATA

1. The User's personal data on the Administrator's website may be processed for the following purposes and on the following legal bases:
 - 1) the performance of the Service or the performance of the concluded Agreement, the sending of an offer (e.g. advertising) at the User's request - on the basis of Article 6(1)(b) of the RODO (necessity to conclude and/or perform the Agreement or to take action upon request);
 - 2) To issue an invoice, bill and fulfil other obligations under tax law in the event that orders for the Services are made - on the basis of Article 6(1)(c) of the RODO (legal obligation);
 - 3) to provide a discount or inform you of promotions and offers from the Administrator or entities recommended by the Administrator - on the basis of Article 6(1)(a) of the RODO (consent);
 - 4) storage of unpaid orders for Services - on the basis of Article 6(1)(f) RODO (legitimate interest of the administrator);
 - 5) the handling of complaints or legal claims relating to the concluded Contract - on the basis of Article 6(1)(b) of the DPA (necessity for the conclusion and/or performance of the Contract) and on the basis of Article 6(1)(c) of the DPA (legal obligation by law);
 - 6) to establish, assert or defend against legal claims - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 7) telephone contact on matters relating to the provision of the Service and the performance of the Contract - on the basis of Article 6(1)(b) of the DPA (necessity for the conclusion and/or performance of the Contract);
 - 8) telephone contact for the purpose of providing an offer and direct marketing - on the basis of Article 6(1)(a) RODO (consent) and on the basis of Article 6(1)(f)

- RODO (legitimate interest of the Administrator), if the User is already a customer of the Administrator;
- 9) the creation of records relating to the RODO and other legislation - on the basis of Article 6(1)(c) RODO (legal obligation) and Article 6(1)(f) RODO (legitimate interest of the controller);
 - 10) archival and evidential purposes, for the purpose of safeguarding information that can be used to prove facts - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 11) analytical, consisting inter alia of the analysis of data collected automatically when using the website, including Cookies e.g. Google Analytics Cookies - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 12) the use of Cookies on the Site and its sub-sites - on the basis of Article 6(1)(a) RODO (consent);
 - 13) Management of the website and the Administrator's pages on other platforms - on the basis of Article 6(1)(f) RODO (legitimate interest of the Administrator);
 - 14) Satisfaction surveys for the Services offered - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 15) for internal administrative purposes of the Controller related to the management of the contact with the User, which is the legitimate interest of the Controller on the basis of Article 6(1)(f) RODO (legitimate interest of the Controller);
 - 16) in order to tailor the content displayed on the Administrator's websites to individual needs and to continuously improve the quality of the Services offered - on the basis of Article 6(1)(f) RODO (legitimate interest of the Administrator);
 - 17) for the purpose of direct marketing aimed at the User of its own Services - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 18) For the purpose of creating Users' own databases - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 19) in order to operate the company's LinkedIn account and interact with with users - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller);
 - 20) in order to operate the company's Twitter account and interact with with users - on the basis of Article 6(1)(f) RODO (legitimate interest of the controller).
2. The provision by the User of data that is not mandatory or excess data that the Administrator does not need to process takes place on the basis of a decision by the User himself, in which case the processing takes place on the basis of the premise contained in Article 6(1)(a) RODO (consent). The User gives his or her consent to the processing of this data and to the anonymisation of data that the Administrator does not require and does not want to process, but the User has nevertheless provided to the Administrator.

IV. METHOD OF COLLECTING PERSONAL DATA

1. Only data provided voluntarily by the User is collected and processed (exception: data collected automatically via cookies and login/registration data).
2. When visiting the website, data on the visit itself, e.g. the user's IP address, browser type, operating system type, etc., are automatically collected. (login data). Data collected automatically may be used to analyse User behaviour on the website, to collect demographic data about Users or to personalise the content of the website in order to improve it. However, this data is processed only for the purposes of administering the website, providing efficient hosting services or targeting marketing content, and is not associated with the data of individual Users.
3. Data may also be collected for the purpose of filling in forms on the website.

V. USER RIGHTS

1. The user is entitled at any time to the rights contained in Articles 15 - 21 RODO, i.e.:
 - 1) The right of access to the content of his/her data;
 - 2) right to data portability
 - 3) the right to rectify data;
 - 4) the right to rectification of data;
 - 5) the right to erasure of the data if there is no longer any basis for the processing;
 - 6) the right to restrict processing if it has been carried out incorrectly or without a legal basis;
 - 7) The right to object to the processing on the basis of a legitimate interest of the controller;
 - 8) the right to lodge a complaint with the supervisory authority, the President of the Office for Personal Data Protection (under the terms of the Personal Data Protection Act), if he/she considers that the processing of his/her data is incompatible with current data protection legislation;
 - 9) the right to be forgotten, if further processing is not provided for by current legislation.
2. The Administrator points out that these rights are not absolute and do not apply to all processing of the User's personal data. This applies, for example, to the right to obtain a copy of the data. This entitlement must not adversely affect the rights and freedoms of others, such as e.g. copyright, professional secrecy.
3. However, the user always has the right to lodge a complaint with a supervisory authority.
4. In order to exercise his/her rights, the User may apply to the Administrator via e-mail address: help@liquizen.com or by letter to the Administrator's place of business address: 9 Eugeniusza Kwiatkowskiego Street, 37-450, Stalowa Wola, indicating the scope of their demands. A response will be provided no later than 30 days from the date of receipt of the request and its justification, unless an extension of this period is justified in accordance with the RODO.

VI. THE RIGHT TO WITHDRAW CONSENT

1. If the User has consented to a specific action, his/her consent may be withdrawn at any time, which will result in the removal of the email address from the Administrator's mailing list and the cessation of the indicated action (in the case of enrolment on the basis of consent). The withdrawal of consent shall not affect the processing of data carried out on the basis of consent before its withdrawal.
2. In some cases, the data may not be completely deleted and will be retained to defend against potential legal claims for a period of time in accordance with the provisions of the Civil Code Act or, for example, to comply with legal obligations imposed on the Administrator.
3. In each case, the Administrator will refer to the User's request, adequately justifying further action arising from legal obligations.

VII. TRANSFER OF DATA TO THIRD COUNTRIES

1. User data may be transferred outside the European Union to third countries.
2. Due to the fact that the Administrator uses external providers of various services, e.g. Google, Microsoft, etc., User data may be transferred to the United States of America (US) in connection with their storage on US servers (in whole or in part). Google uses the compliance mechanisms provided for by the RODO (e.g. certificates) or standard contractual clauses in relation to its services. They will only be transferred to recipients who guarantee the highest data protection and security, including by:
 - 1) cooperation with processors of personal data in countries for which a relevant European Commission decision has been issued,
 - 2) the use of standard contractual clauses issued by the European Commission (such as in the case of Google),
 - 3) the application of binding corporate rules approved by the competent supervisory authority, or to those to whom the User has consented to the transfer of personal data.
3. Detailed information is available in the content of the privacy policy of each provider of these services, available on their websites. For example: Google LLC: <https://policies.google.com/privacy?hl=pl>.
4. Currently, the services offered by Google are mainly provided by entities located in the European Union. You should, however, always refer to the privacy policies of these providers in order to receive up-to-date information on the protection of your personal data.

VIII. STORAGE TIME

1. The User Data will be stored by the Administrator for the duration of the Services and:

- a) for the duration of the performance of the Service and the cooperation in the performance of the Agreement, as well as the period of limitation of claims under the law, with regard to data provided by contractors and customers or Users,
- b) for the period of discussions and negotiations preceding the conclusion of the Agreement or the performance of the Service - with regard to the data provided in the request for proposal,
- c) for the period required by law, including tax law, in respect of personal data involving the fulfilment of obligations under applicable legislation,
- (d) until such time as an effective objection is lodged on the basis of Article 21 RODO - in relation to personal data processed on the basis of a legitimate interest of the controller, including for direct marketing purposes,
- e) until the withdrawal of consent or the achievement of the purpose of the processing, the business purpose - for personal data processed on the basis of consent. After the withdrawal of consent, the data may still be processed for the purpose of defending against possible claims in accordance with the limitation period for such claims or the (shorter) period indicated to the User,
- f) until it becomes obsolete or no longer relevant - with regard to personal data processed mainly for analytical and statistical purposes, use of Cookies and administration of the Administrator's website.

IX. DATA SECURITY

1. The User's personal information is stored and protected with due care, in accordance with the Administrator's implemented internal procedures. The Administrator processes User information using appropriate technical and organisational measures that meet the requirements of generally applicable laws, in particular the regulations on personal data protection. These measures are primarily aimed at protecting the Users' personal data from access by unauthorised persons.
2. In particular, only authorised persons who are obliged to keep the data confidential or entities entrusted with the processing of personal data on the basis of a separate data entrustment agreement have access to Users' personal data.
3. At the same time, the user must take care to protect his/her personal data transmitted over the Internet, in particular not to disclose his/her login data to third parties, to use anti-virus protection and to keep his/her software up to date.

X. RECIPIENTS OF PERSONAL DATA

1. The Administrator informs you that it uses external service providers. The external service providers that are involved in the processing of the User's personal data are: the hosting provider, which stores the data on the server, the cloud service provider, which stores files that may contain the User's personal data, the invoicing system provider, which stores the User's data for the purpose of invoicing, the technical service provider, which accesses the data if the technical work carried out relates to areas where personal data is located, other subcontractors, which access the data if the scope of their activities requires such access.
2. All the entities mentioned above process your personal data on the basis of personal data processing trust agreements and guarantee an adequate level of personal data protection.
3. If the need arises, your personal User data may be shared with a legal advisor or lawyer bound by professional secrecy. The need may arise from legal advice requiring access to your personal data.
4. The User's personal data may also be forwarded to the tax authorities to the extent necessary for the fulfilment of tax and accounting obligations. This includes, in particular, all declarations, reports, statements and other accounting documents containing the User's personal data.
5. In addition, if necessary, the User's personal data may be made available to entities, authorities or institutions entitled to access the data on the basis of the law, such as police services, security services, courts, public prosecutors' offices.

XI. OBLIGATIONS IN RELATION TO DATA PROCESSING

1. The Personal Data Controller hereby informs you that he has not appointed a Data Protection Officer (DPO) and performs the duties related to the processing of personal data independently.
2. The User acknowledges that his/her personal data may be provided to authorised state authorities in connection with their proceedings, at their request and upon fulfilment of the prerequisites confirming the necessity of obtaining such data from the Administrator.

XII. FORMS

1. The Administrator uses the following within its Site:

Registration Form - enables the creation of a User Account on the Platform. Personal data in the form of name, surname, company name, telephone number (if applicable), e-mail address and data provided in the content of the message, shall be processed by the Administrator in accordance with this Privacy Policy in order to contact User and to present the User with an offer. After termination of contact with the User, the data may be archived, which is a legitimate interest of the Administrator. The Administrator is unable to determine the exact period of archiving and thus deletion of messages. However, the maximum period will not be longer than the limitation periods for claims under the law. The creation of a User Account shall take place in accordance with the rules stated in the in the Terms of Service and is an electronically provided service.

XIII. TECHNOLOGIES

1. In order to use the Administrator's website, it is necessary to have: a device with access to the Internet, an active electronic mailbox receiving e-mails, a web browser capable of displaying web pages, software capable of reading content in the formats presented, e.g. pdf.

XIV. COOKIE POLICY

1. In order for the Platform to function correctly, the Service Provider uses cookie technology. Cookies are packages of information stored on Users' devices through the Platform, usually containing information in accordance with the purpose of the file, by means of which the User uses the Platform. Cookies usually contain the address of the Platform, the date of insertion, the expiry date, a unique number and additional information in accordance with the purpose of the file in question.
2. When the User visits the Administrator's website, a banner will be displayed indicating that it uses cookies. If the User selects the "Allow all" option, this will mean that he/she accepts all cookies that are placed on the Administrator's website and confirms that he/she has read the information on cookies and the purposes of their use, as well as the cases in which data collected with the help of cookies are transferred to the Administrator's partners.
3. In the case of essential cookies, the User's consent is not required as these cookies ensure the full and uninterrupted functioning of our website. These cookies are exempt from the requirement to obtain the User's consent in accordance with Article 173 (3) of the Telecommunications Act.
4. The Service Provider uses two types of Cookies: session Cookies, which are deleted permanently when the Users' browser session ends, and permanent Cookies, which remain after the end of the browser session on the Users' devices until they are deleted.
5. It is not possible to establish the identity of Users on the basis of Cookies, whether session or persistent. The Cookies mechanism does not allow any personal data to be collected. Persistent Cookies are stored on the User's computer or mobile device for a

maximum of 12 months. Session Cookies, on the other hand, are only stored temporarily and are deleted when the browser is closed.

6. The Service Provider's Cookies are safe for the Users' devices, in particular they do not allow viruses or other software to enter the device. In contrast, External Cookies (i.e. Cookies placed by the Service Provider's partners) can be read by an external server.
7. Users may disable the storage of Cookies on their device, in accordance with the according to the instructions of the browser manufacturer, but this may result in the unavailability of some or all of the Platform's functions.
8. The Platform uses the following types of cookies:
 - a) "indispensable" cookies to enable the use of the services available on the Platform, e.g. authentication cookies used for services requiring authentication on the Platform;
 - b) security cookies, such as those used to detect abusive authentication on the Platform;
 - c) "performance" cookies, enabling the collection of information about how the Platform's websites are used;
 - d) "functional" cookies, enabling "remembering" the User's chosen settings and personalizing the User's interface, e.g. with regard to the User's chosen language or region of origin, font size, website layout, etc;
 - e) "Advertising" cookies, enabling the delivery to Users of advertising content more tailored to their interests.
9. In many cases, the web browsing software (web browser) allows cookies to be stored on the Users' terminal equipment by default. Users can change their settings regarding cookies at any time. These settings can be changed, in particular, in such a way as to block the automatic handling of cookies in the settings of the Internet browser or inform on their placement in the User's devices each time. Detailed information on the possibility and methods of using cookies is available in the settings of your software (web browser).
10. Cookies are placed on Users' terminal equipment and may also be used by advertisers and partners cooperating with the Platform operator. Users may change their settings concerning Cookies at any time, specifying the conditions for storing them, through their web browser settings or by configuring the service. Users may also delete Cookies stored on their device at any time, in accordance with the instructions of the browser manufacturer.
11. Detailed information on the handling of cookies is available in your browser settings.

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