1. Scope of the Privacy and Cookies Policy

The data administrator is the Akademickie Inkubatory Przedsiębiorczości Foundation with headquarters: Al. Fr. Józefa Poniatowskiego 1, 03-901 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under KRS number 0000199402, NIP number 5242495143 (hereinafter “Foundation”, “we” or “us”, “Administrator”).

We are committed to doing the right thing when it comes to collecting, using, and protecting personal data. We want you to be sure that your data is safe with us and to fully understand how we use it to offer you better and more personalized services. That is why this Privacy Policy was developed and cookies (hereinafter “Policy”), which:

- identifies the types of personal information we collect;
- explains how and why we collect and use your personal data;
- explains when and why we will share your personal data with other organizations;
- explains your rights and choices you have when it comes to your personal data.

Due to the range of services we offer, we want you to be clear about what this Policy covers. This Policy applies to you if you use our services (referred to in this Policy as “our Services”). Using our Services means:

- Creating an account on our Website and using our Services offered as part of its functionality;
- This Policy also applies if you contact us or we contact you about our Services;
- Signing in to our newsletter

Our websites or mobile applications may contain links to other websites operated by other entities that have their own rules and privacy policies that explain how they use your personal data. In such situations, please read these terms and privacy policies carefully before providing any personal information on such a website, as we do not accept any liability for third-party websites.

2. Personal data we collect

This section provides information about the personal information we may collect from you when you use our Services and other personal information we may receive from other sources.

| By registering for our Services, you can provide us with: | • Your personal information, including postal address, e-mail address, telephone number and date of birth; |
| | • Account login details such as username and password that you have chosen; |
| | • Payment info like credit/debit card information; |
| | • User content, for example, information or content you upload (which can include Personal Data if you include Personal Data in such content) |

| When browsing our Websites or using our mobile applications, we may collect: | • Information on how to view our Websites and mobile applications as well as information about clicking one of our advertisements (including websites of other organizations); |
| | • Information about any devices used to access our Services (including make, model and operating system, IP address, |
If you use coupons, vouchers, discount codes or referral codes, we may collect:

- Information on how and when you use coupons, vouchers, discount codes or referral codes;

When contacting us, or when we contact you or take part in promotions, contests, surveys or surveys regarding our Services, we may collect:

- The personal information that you provide about yourself each time you contact us about our Services (for example, your first name and surname, username, contact details, login), including by phone, e-mail or post or while talking to us via social media;
- Details of e-mails and other digital messages that we send to you, along with any links you click;
- Twoja opinia i wkład w ankietach satysfakcji klientów;

3. Other sources of personal data

We may also use personal data from other sources, such as: specialized companies that provide information, our business partners and public registers. This type of personal data helps us:

- review and improve the accuracy of the data we have;
- improve and measure the effectiveness of our marketing communications, including online advertising;

4. How and why used personal information

In the table below, we explain in detail how and why we use personal data:

<table>
<thead>
<tr>
<th>We use personal data to:</th>
<th>This means that the processing of your personal data allows us to:</th>
<th>Why do we process your data in this way?</th>
<th>Legal basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensuring the high availability</td>
<td>Managing the account you have created on our Website.</td>
<td>We need to process your personal data so that we can: manage your user account and provide you with the services you want to use.</td>
<td>Necessity to perform the contract</td>
</tr>
</tbody>
</table>

When we process:

- contact details;
- user profile information.

Without this information, we will not be able to provide you with our services.
<table>
<thead>
<tr>
<th>Management and improving our day-to-day business operations</th>
<th>Managing and improving our Services and mobile applications.</th>
<th>We use cookies and similar technologies on our websites and in mobile applications to improve the quality of customer service. Some cookies are necessary, so you should not turn them off to be able to use all the functions of our websites and mobile applications. You can disable other cookies, but it may affect your feelings from using our sites. More information about cookies and how to disable them can be found in the Cookies and similar technologies section.</th>
<th>Legally justified purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developing and improving our service offering, know-how and the way we communicate with you.</td>
<td>We use cookies and similar technologies on our websites and in mobile applications to improve the quality of customer service. Some cookies are necessary, so you should not turn them off to be able to use all the functions of our websites and mobile applications. You can disable other cookies, but it may affect your feelings from using our sites. More information about cookies and how to disable them can be found in the Cookies and similar technologies section.</td>
<td>We rely on the use of personal data to conduct market research, as well as to improve our IT systems (including security) and our services. This enables us to serve you better as a customer.</td>
<td>Legally justified purpose</td>
</tr>
<tr>
<td>Detect fraud and other crimes and prevent them.</td>
<td>It is important that we monitor our Services in the context of detecting and preventing fraud and other crimes and misuse of services. This will help us make sure that you can safely use our Services.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personalizing services to your expectations</td>
<td>Analyzing your browsing habits on our Websites in order to be able to better understand you as our user and provide you with personalized services.</td>
<td>Viewing your behavior allows us to personalize our services. This will help us meet your needs as a user.</td>
<td>Legally justified purpose</td>
</tr>
<tr>
<td>Sending relevant marketing messages (including by e-mail, traditional mail or in the form of online advertising) regarding our services and the services of our partners. Accordingly, online advertising may be displayed on our websites and on third party websites and other online media channels. We can also measure the effectiveness of our marketing communications and our business partners.</td>
<td>We want to make sure that we deliver marketing communications, including online advertising, that are relevant to your interests. To achieve this, we measure your responses to marketing communications related to the services we offer, which means that we can offer you services that better meet your needs as a customer.</td>
<td>For most marketing communications, we rely on your consent, but there are situations where it is for our legitimate purpose.</td>
<td>For most marketing communications, we rely on your consent, but there are situations where it is for our legitimate purpose.</td>
</tr>
<tr>
<td><strong>Contact and interact with you</strong></td>
<td>Contacting you about our Services, for example by phone, by email or post, or by replying to social media posts that you have directed to us.</td>
<td>We want to serve you best as a customer, so we use personal data to provide clarification or assistance in response to your communications.</td>
<td><strong>Legally justified purpose</strong></td>
</tr>
<tr>
<td>---------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td><strong>Legally justified purpose</strong></td>
<td>Manage promotions and competitions in which you participate, including those we conduct with our trading partners.</td>
<td>We need to process your personal data so that we can manage promotions and contests in which you choose to participate.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Invite you to participate in user satisfaction surveys and other market research conducted by us and other organizations acting on our behalf.</td>
<td>We conduct market research to improve our Services. However, if we contact you about this, you do not need to take part in the study. If you tell us you don't want us to be contacted with you to research the market, we will respect your choice. This will not affect your ability to use our Services.</td>
<td></td>
</tr>
</tbody>
</table>

5. **Our legally justified purposes in using your personal data**

Where we have mentioned above that the use of personal data is based on our "legitimate purpose", these are:

- handling the needs of our clients, including the provision of our services;
- promoting and marketing our services;
- account service (for example, an online user account), managing complaints and resolving any disputes;
- understanding our users, including their patterns, behavior, as well as their tastes and preferences;
- protection and support of our business, business partners, associates, users and co-owners;
- testing and developing new services as well as improving existing ones;
- legal / regulatory requirements.

6. **How and why we share personal data with service providers**

In this section, we explain how and why we share personal information with service providers. When we share personal information with these companies, we require them to maintain security and must not use your personal information for their own marketing purposes.

| **Service Providers** | We work with carefully selected service providers who perform specific functions on our behalf. These include, for example, companies that help us provide: customer services, technology services, data storage and merging, payment processing and delivering orders. We only share personal information that enables our suppliers to provide these services. Some of the service providers we work with operate online media channels as part of which they place relevant advertisements for our services, as well as |
|-----------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------------|
for our suppliers. For example, you may see an advertisement for our services when you use a specific social networking site or watch Internet TV.

7. How and why we share personal data with other entities

We may share personal information with other organizations in the following circumstances:

- when the law or a public authority says that we need to provide personal data;
- when we need to share personal data in order to establish, exercise or defend our legal rights (including the transfer of personal data to others for the purposes of fraud prevention and reducing credit risk);
- to the organization we sell or transfer (or enter into negotiations to sell or transfer) any of our rights or obligations under any contract we may have with you. If the transfer or sale is successful, the entity that receives your personal information may use your personal information in the same way as we do;
- to any legal successors related to our business.

8. How we protect your personal data

We know how important it is to properly secure and manage personal data. This section presents selected from the measures we have introduced. To ensure the security of your data, we use computer security, such as:

- restricting access only to employees who need it to perform their job duties;
- we enforce physical, electronic and procedural safeguards related to the collection, storage and disclosure of personal data;
- physical access controls to our buildings and files;
- firewalls and data encryption during transmission using the Secure Sockets Layer (SSL) protocol.

However, despite taking appropriate technical and organizational measures to protect personal data, we cannot guarantee the security of any personal data transmitted to us via the Internet.

The personal data we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA"). They may also be processed by companies operating outside the EEA that work for us or for one of our service providers. If we do so, we ensure that your privacy rights are respected in accordance with this Policy. The most common way we do this is to enter a specific type of contract (more information on this topic can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en) or through an approved program such as the Privacy Shield: https://www.privacyshield.gov/welcome.

9. How long do we process personal data

We will not store your personal data longer than we need it, which depends on several factors:

a) (First of all) the reason why we collected them;
b) How long ago were they collected;
c) Is there a legal / regulatory basis for us to keep;
d) Do we need them to protect your or our interests.

10. Possibility of choice regarding receiving marketing messages and participating in market research
We will send you relevant offers and information about our services in a number of ways, including by email, but only where you have previously consented to receive this marketing information. When registering on our Website, we will ask you if you want to receive marketing communication. You will be able to change your choice of marketing preferences at any time via the settings panel as part of your user account, by email gdpr@gendocu.com, by telephone +48-533-004-399 or in writing Poland, al. Czerwonych Maków 42, 59-220 Legnica City.

We would also like to hear from you that will help us improve our Services, so it may happen that we will contact you to conduct market research. You will always have a choice whether to participate in our market research or opt out.

11. How we use cookies

Cookies (so-called "cookies") are IT data - in particular text files - are placed by our Website during each visit to the User's end device, which allows our websites to remember the User's computer or device and serves several purposes. The entity that places cookies on the Website User's end device and obtains access to them is the Foundation. The Website server automatically records information sent by the User's browser when displaying the website. The server logs may contain information such as network request, IP address, browser type and language, date and time of sending the request. This information allows us to improve the quality of our Services by identifying and storing User preferences and tracking trends, such as the ways in which our Websites are searched.

The following types of cookies are used on our websites:

<table>
<thead>
<tr>
<th>ACTION</th>
<th>CHARACTERISTIC</th>
<th>TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensuring performance</td>
<td>• compatibility (e.g. identification of the browser type);</td>
<td>Session -&gt; cookies are deleted when the browser is closed</td>
</tr>
<tr>
<td></td>
<td>• optimization (e.g. measuring the loading time of the Website content);</td>
<td></td>
</tr>
<tr>
<td>Increasing security</td>
<td>• checking whether the user's device is logged in securely throughout the duration of his visit to the Website;</td>
<td>Session -&gt; cookies are deleted when the browser is closed</td>
</tr>
<tr>
<td>Remembering preferences</td>
<td>• improving the operation of the Website, e.g. through personalized content, greeting or remembering the selected language;</td>
<td>Session -&gt; cookies are deleted when the browser is closed</td>
</tr>
<tr>
<td>Use analysis from the Website</td>
<td>• collecting statistics on, among others the total number of visits and references to the Website;</td>
<td>Permanent -&gt; deleted after a longer lack of visiting the Website</td>
</tr>
<tr>
<td>Feedback from Website Users</td>
<td>• not displaying one-time notifications after the User has moved to the next subpage of the Website;</td>
<td>Session -&gt; cookies are deleted when the browser is closed</td>
</tr>
<tr>
<td></td>
<td>• not displaying cyclical notifications for a defined period;</td>
<td>Permanent -&gt; deleted after a longer lack of visiting the Website</td>
</tr>
<tr>
<td>Plugins / Widgets</td>
<td>• sharing the content of the Website on social platforms;</td>
<td>Permanent -&gt; deleted after a longer lack of visiting the Website</td>
</tr>
<tr>
<td></td>
<td>• recording user interactions on the Website (e.g. using a share counter);</td>
<td></td>
</tr>
<tr>
<td>Providing appropriate marketing content (especially online advertising)</td>
<td>• providing online advertisements, which in our opinion are most important to you on our websites and websites of other entities;</td>
<td>Permanent -&gt; deleted after a longer lack of visiting the Website</td>
</tr>
<tr>
<td>Measuring the effectiveness of our marketing communications (including online advertising)</td>
<td>• measuring the effectiveness of our online advertising campaigns and those sent via e-mail;</td>
<td>Permanent -&gt; deleted after a longer lack of visiting the Website</td>
</tr>
<tr>
<td></td>
<td>• controlling the number of times the advertisement is displayed.</td>
<td></td>
</tr>
</tbody>
</table>
Cookies placed on the Website User's end device may also be used by third parties to offer users additional functionalities. The use of the above tools or widgets may result in the collection of cookies on users' devices in order to facilitate the use of these websites and to ensure that user interaction is displayed correctly on our websites.

12. Your choice regarding cookies

Although most web browsers automatically allow cookies to be placed on the computer, the User may refuse to receive cookies, thus remaining anonymous. In this case, it should be remembered that by not agreeing to the placement of cookies, the user will not be able to fully use all the functions of the Website. In order to configure the options of your device in terms of consent to the storage of cookies and to determine the scope of saved cookies, the User may change the settings of the web browser used (in most cases, such an option can be found in the Tools or the browser preferences menu).

Please be advised that if the User fails to change the cookie settings, they will be included on the User's end device. In this case, our websites may store information on the User's end device and access this information.

Information on the management of cookies in individual browsers can be found on the pages dedicated to individual browsers:

- Firefox: https://support.mozilla.org/pl/kb/ciasteczka
- Chrome: https://support.google.com/chrome/answer/95647?hl=pl
- Safari: https://support.apple.com/pl-pl/HT201265

Additional information on managing cookies can be found on websites such as:
http://allaboutcookies.org

13. The right to access data

You have the right to access your personal data that we store.

14. Other rights of persons whose data is processed

In relation to your personal data, you also have:

14.1. The right to correct data

If you believe we have inaccurate or missing information about you, please let us know and we will correct it.

14.2. Right to object

General objection - we will consider your objection to our use of your personal data. If your rights outweigh our interests in using your personal data, then, at your request, we will either restrict processing (see section 14.3 below) or delete it (see section 14.4 below).

Objection to direct marketing - in the event of such an objection, we will stop using your personal data for direct marketing purposes. As a result of objection to direct marketing and in the event that we have no other legal basis for their use, the processing of your personal data will be suspended within 30 days.

14.3. The right to limit data processing
There are several situations in which you can restrict the use of your personal data, including (but not limited to):

- you have made a general objection (listed in section 14.2 above);
- you contest the accuracy of the personal data we hold;
- we have used your personal data unlawfully but you do not want us to delete it.

14.4. **The right to delete data**

There are several situations where you can ask us to delete your personal data, including (but not limited to):

- we no longer need to store your personal data;
- you have successfully filed a general objection (listed in section 14.2 above);
- you have withdrawn your consent to our use of your personal data (and we have no other reason to use it);
- we have unlawfully processed your personal data.

14.5. **Right to data portability**

If you want to receive a copy of the personal data we hold about you, please contact us via the following address: gdpr@gendocu.com.

14.6. **The right to lodge a complaint with a supervisory authority**

We would like to be able to resolve any of your requests and comments, however you also have the right to lodge a complaint directly with the local supervisory authority if you believe that we are processing your personal data unlawfully.

15. **How to contact us**

If you have questions about how personal data is collected, stored and used, please contact us:

Phone: +48-533-004-399
E-mail: gdpr@gendocu.com
Mail: Poland, al. Czerwonych Maków 42, 59-220 Legnica
You can also contact the Administrator via the e-mail address: growth@aip.link.

Polityka została ostatnio zaktualizowana: 11.04.2021