

PRIVACY POLICY
INFORMATION CLAUSE
FOR NATURAL PERSONS
USERS OF ZILLIN.IO

Based on the Regulation of the European Parliament and of the Council (EU) 2016/679 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, GDPR) (O J EU L. of 2016 No 119, p. 1, as amended, hereinafter referred to as the GDPR), we hereby inform you that:

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1. The data controller of your personal data is:

Adaptive Vision Spółka z ograniczoną odpowiedzialnością with its registered office at ul. Bojkowska 35A, 44-100 Gliwice, Poland, entered in the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under the number: 0000749832, VAT No (NIP): 6312681823, statistical ID (REGON): 381349210, hereinafter referred to as the Data Controller; contact data: tel.: +48 32 461 23 30, e-mail: hello@zillin.io.

2. Entities subject to this Information Clause:

This Information Clause applies to users of the following website: www.zillin.io, hereinafter referred to as the Website, as well as to personal data of natural persons being representatives, proxies, employees of Website users if Website users are legal persons, and to recipients of commercial information sent by the Data Controller.

3. Personal data acquisition by the Data Controller:

You provide your personal data voluntarily in the application/contact form on the Website or in the registration form or by e-mail or by phone.

If you are a user invited to cooperation by the Website Customer, we acquire your personal data first from the Customer that invited you to cooperation in supplying the Website's services. If you do not confirm your cooperation within the defined time limit by signing in the Website, then we will delete and will not process your data.

4. Purpose and basis of personal data processing:

We can process your personal data in particular for the following purposes:

- 1) if you send an inquiry, information or offer to us via our contact form on the Website, we will process your data to respond to your inquiry, offer, information or any other content you send via the contact form (Art. 6.1.a and 6.1.f of the GDPR);
- 2) if you start talks concerning an agreement or enter into the agreement with Adaptive Vision Sp. z o.o., your data will be processed for the purpose of entering into or performing such an agreement, respectively (Art. 6.1.a of the GDPR);
- 3) to sign in on the Website and operate your account opened on the Website (Art. 6.1.a of the GDPR);
- 4) to supply services available on the Website to you or to the Customer that invited you, as a user, to cooperation in supplying the Website's services (Art. 6.1.a of the GDPR);
- 5) in addition, to exercise our legitimate interest and in connection with your consent to receive commercial information, we will process your personal data for promotion and direct marketing purposes under the Data Controller's business activity and send you newsletters, information about promotions, novelties, events, as well as advertisements of our products and services, invitations to training, promotional actions, various types of events organised by or with Adaptive Vision Sp. z o.o. (Art.6. 1.f of the GDPR);

- 6) for archiving (evidence) based on the Data Controller's legitimate interest to protect information in case of a legal need to prove facts (Art. 6.1.f of the GDPR);
- 7) to prepare analyses and statistics for the purpose of the Data Controller's activities (Art. 6.1.f of the GDPR);
- 8) to identify, make or defend against claims coming within the Data Controller's legitimate interest (Art. 6.1.f of the GDPR);
- 9) for purposes subject to your separate personal data processing consents (Art. 6.1.a of the GDPR);
- 10) to organise competitions and marketing or discount actions you will attend (Art. 6.1.b of the GDPR);
- 11) to handle payment services (Art. 6.1.b of the GDPR);
- 12) to fulfil other legal obligations or exercise other lawful rights of the Data Controller and its partners (Art. 6.1.c of the GDPR).

5. Data recipients

To achieve the purposes of your personal data processing, we can share your personal data with the following categories of recipients:

- 1) entities handling payments for the Administrator if we enter into a payment-related agreement with such entities;
- 2) carriers, couriers and transport companies, if we ship the goods you order or send written correspondence to you;
- 3) IT and software service suppliers, hosting companies;
- 4) tax advisors, legal counsellors, entities providing book-keeping services, auditors;
- 5) tax authorities, inspectors, public or local government authorities and offices authorised to obtain personal data based on applicable legal regulations;
- 6) in addition, your data can be transmitted to third states (including, without limitation, the USA) in connection with actions taken in social media and the use of plugins and other tools coming from such websites (including, without limitation, Facebook, Twitter, Google+) or if the above mentioned data recipient (e.g. supplier of hosting services) has its registered office in a third country.

6. Data retention time:

We will store your personal data, depending on the purpose of data processing, for the following periods:

- 1) for a period necessary to respond, explain, comment on or react otherwise to your inquiry;
- 2) for a period necessary to enter into the agreement;
- 3) for the term of the agreement, including the period set out by law to make claims under such an agreement and till the end of 12 months of the end of the limitation period in relation to all claims arising from or likely to arise from our offer that has been accepted or submitted or an agreement that have been entered into by the parties, with regard to data that are necessary to enter into or perform the agreement;
- 4) for the period you have an account on our Website;
- 5) if you have been invited to cooperation, until you open a separate account; then your data will be retained for the period your account on the Website is active;
- 6) until you request us to change or delete your personal data from the Data Controller's files or you withdraw your data processing consent if we process your data on the basis of your consent;
- 7) until you object to personal data processing if the data are processed on the basis of the Data Controller's legitimate interest;
- 8) any time, for a period required by law to enable the Data Controller to fulfil its obligations or exercise its rights stemming from the regulations and make or defend against claims;
- 9) for archiving or statistic purposes, for a period not longer than 10 years from the expiry of our legal relationship with you.

7. Right to object

If your personal data are processed on the basis of Adaptive Vision's legitimate interest or for direct marketing purposes, you have the right to object to your personal data processing. Then, we will stop processing your data for such purposes unless we can prove that the lawful basis of the processing prevails over your interests, rights and freedoms or that we need your data to establish, exercise or defend our claims. You can lodge your objection by phone, e-mail or ordinary mail to the address of the Data Controller's registered office in accordance with the contact data given in Art. 1 hereof.

8. Rights connected with personal data processing:

In accordance with the GDPR, in connection with your personal data processing, you have the following rights:

- 1) the right of access to, right to rectification, erasure or restriction of processing of your personal data under terms and conditions set out in the GDPR;
- 2) to the extent to which your personal data are processed on the basis of the Data Controller's legitimate interest or for direct marketing purposes, the right to object under terms and conditions set out above;
- 3) to the extent to which your personal data are processed on the basis of your consent, the right to withdraw your consent. The withdrawal of the consent is without prejudice to the compliance of the processing based on the consent given before such withdrawal;

- 4) to the extent to which your data are processed in order to enter into and perform the agreement or on the basis of your consent, you have the right to data portability, i.e. the right to receive personal data in the structured, commonly used and machine-readable format from use to share them with another data controller;
- 5) the right to lodge a complaint with the Chairman of the Personal Data Protection Office if there is a suspicion that the processing violates the personal data protection regulations.
- 6) The personal data must be provided to the extent to which they are necessary to enter into and perform the agreement. Otherwise the agreement cannot be entered into or performed. If you do not give the data that are to be processed on the basis of your consent, we will not take actions for you that are subject to such a consent.
- 7) Your data will not be subject to automated profiling on the Website.
- 8) The personal data can be transmitted to a non-EEA country (third state) or an international organisation within the meaning of the GDPR to the extent set out in Art. 5.6 above.

9. Source of data (*information refers to personal data obtained otherwise than from the data subject*)

Your personal data can come from your principal if you obtained a power of attorney, from an enterprise which you represent, or, if you are an employee authorised to contact the Data Controller, from an entity being a party to the Website service agreement with the Data Controller, as well as from commonly accessible sources, including in particular databases and records: the National Court Register (KRS), the Central Registry and Information about Business Activities (CEIDG), Statistical Record (REGON).

If you are a user invited to cooperation by the Customer, we acquire your personal data firstly from the Customer that invited you to cooperation on its account.

10. Categories of personal of data (*information refers to personal data obtained otherwise than from the data subject*)

The Data Controller processes the following categories of your personal data obtained otherwise than directly from you: identification, address and contact data.