

# Privacy Policy of the XL8.pl website

[before 22nd May 2018]

## 1. Definitions of the terms used in the Privacy Policy

1. The User - a natural person who is not a consumer within the understanding of the Civil Code, a legal person or an organizational unit without legal personality, using the services provided electronically via the website indicated in item 4; 4;
2. Personal data - any information relating to an identified or identifiable natural person.
3. Operator, Administrator of Users' Personal Data - Localize.pl Agenor Hofmann-Delbor Jacek Mikrut Spółka jawna, with its registered office in Szczecin, under the address: ul. Smolańska 3; 70-026 Szczecin, entered under the number 0000594783 into the Register of Entrepreneurs of the National Court Register kept by the District Court Szczecin - Centrum in Szczecin, 13th Commercial Division of the National Court Register;
4. Website - the website located in the xl8.pl web domain

## 2. General information.

1. The operator of the xl8.pl website as well as the entity providing the services specified in the rules of the Website by electronic means is Localize.pl Agenor Hofmann-Delbor Jacek Mikrut Spółka jawna, with its registered office in Szczecin, at the following address: ul. Smolańska 3; 70-026 Szczecin, entered under the number 0000594783 into the Register of Entrepreneurs of the National Court Register kept

by the District Court Szczecin - Centrum in Szczecin, 13th Commercial Division of the National Court Register.

2. The Operator may acquire information about the Users and their behavior in the following way:
  - *through the information and data voluntarily entered in forms;*
  - *through information and data voluntarily entered in the forums, groups and profiles of the Operator and the Website or other platforms used for the exchange of information and opinions between the Operator and the Users;*
  - *through the storage of cookie files on end devices;*
  - *through the storage of location information based on the data from the Internet browser;*
  - *through collecting web server logs.*
3. The Operator makes every effort to provide the Website Users with protection of their privacy, and applies a policy of minimizing the activities leading to the provision of data concerning the Users or entrusting third parties with the processing of such data.

### 3. Website forms.

1. The Operator uses forms to collect and process only the personal information and data provided by the User voluntarily.
2. The Website may also store information on connection parameters (time stamp, IP address).
3. The data stored in the form are protected by the Operator in accordance with the rules set forth in this Privacy Policy.

4. The data provided in the form are processed for the purpose resulting from the function of a specific form, e.g. for the purpose of handling a service request or for the purpose of making a business contact.
5. The data provided in the forms may be provided to entities providing certain services in technical terms - in particular, it concerns the transfer of information on the owner of the registered domain to entities which are Internet domain operators (above all, the Scientific and Academic Computer Network ("Naukowa i Akademicka Sieć Komputerowa") - NASK), websites handling payments or other entities with which the Website Operator cooperates in this respect. Detailed rules on the provision of data to third parties are specified in item 7 of the Privacy Policy.
6. When the forms available on the Websites are being filled in, the Operator shall provide a link secured with a security certificate in order to prevent the data from being intercepted by unauthorized entities.
7. In each case, the Operator informs the User about the purpose and scope of processing of the personal data provided by them exceeding the performance of the agreement, i.e. the provision of reserved or purchased services.

#### 4. Server logs.

1. Information about certain behaviors of Users is subject to logging in the server layer. These data are used to administer the website and to ensure the most efficient handling of the provided services.
2. The browsed resources are identified by URL addresses. Furthermore, the following may be subject to recording:
  - *inquiry arrival time*

- *response send time*
  - *client station name – in case of identification via an HTTP protocol,*
  - *information on errors that occurred during the execution of a transaction - in the case of execution via the HTTP protocol,*
  - *the URL address of the page previously visited by the User (referrer link) - in the case when access to the Website was made through a link,*
  - *information on the User's browser,*
  - *Information on the IP address.*
3. The above data may be associated with specific Users of the Website.

## 5. Newsletter and contact with Users by electronic means

1. Subscribing to electronic and free newsletters belonging to the Operator requires providing one's name and e-mail address or other required data in the appropriate form. The Operator clearly marks the fields that are required to be filled in to order the newsletter. The data obtained in this way are added to the Operator's mailing list. An e-mail address is necessary for sending the requested content to the given reader. The name allows for addressing the readers by name. Other data (i.e. surname, profession, company name, interests) allow to personalize the messages and newsletter content.
2. Newsletters contain information about the Website, services and products of the Operator (e.g. promotions, new offers, conferences, webinars, industry meetings), non-commercial letters (e.g. greetings, personal comments, etc.) and other commercial information about the Website's topic and services of the Operator (promotions, advertisements, other marketing materials).
3. Consent to receiving newsletters is always voluntary. The Operator shall never make the acceptance of an order for a service or the registration of a User in the Website dependent on the consent to receive a newsletter.

4. Consent to receive the newsletters is tantamount to consenting to the following: Acting as an end-user within the meaning of article 172 sec. 1 of the Act of 16 July 2004 - the Telecommunications Law (i.e. Journal of Laws from 2016, item 1489, as amended), I hereby agree for the Operator (Localize.pl Agencja Marketingowa Jacek Mikrut Spółka jawna, with its registered office in Szczecin) to conduct direct marketing using telecommunication end devices by sending marketing and commercial information by electronic means to the e-mail address provided by me, which at the same time constitutes the ordered commercial information referred to in article 10 of the Act of 18 July, 2002, on electronic provision of services (i.e. Journal of Laws from 2017, item 1219, as amended).
5. The user may revoke their consent to receive newsletters at any time. Revocation of consent to receive newsletters shall not result in limitation or exclusion of other services of the Operator, unless such effect is clearly communicated to the User before the acceptance of their declaration of resignation.
6. The revocation of consent to receive newsletters shall be made by ticking the appropriate box in the body of the message confirming the ordering of the newsletter service, and then - in the body of each subsequent newsletter by the User. Regardless of the method indicated in the preceding sentence, the User may at any time submit to the Operator a declaration of resignation from the newsletter service (as well as any other service available on the Websites). The declaration may be submitted to any company, however, the Operator recommends sending it by e-mail to the address of the Operator.
7. Regardless of the newsletter, the Operator reserves the right to send unannounced messages to the Users whose contact details they hold and who have accepted the Privacy Policy. Unannounced messages not constituting a newsletter directly refer to the services of the Operator and the operation of the Website and include technical information (including breaks and changes in the operation of the Service, new functionalities) and legal and organizational information (including information on changes in the regulations or organizational transformations of the Operator).

## 6. The User's telephone number and contact with the Users via telephone communication devices

1. In the service order forms on the Website, the Operator shall clearly indicate whether the User's provision of their telephone number is necessary for the order and provision of the service.
2. The User may allow the Operator to inform them about new services, offers or industry events by initiating telephone calls or sending SMS/MMS messages to the provided telephone number. The Operator reserves that such information or offers may constitute direct marketing of goods and services.
3. Agreeing to receive information and offers to the given telephone number is tantamount to providing the following consent: Acting as an end-user within the meaning of article 172 sec. 1 of the Act of 16 July 2004 - the Telecommunications Law (i.e. Journal of Laws from 2016, item 1489, as amended), I hereby agree for the Operator (Localize.pl Agenor Hofmann-Delbor Jacek Mikrut Spółka jawna, with its registered office in Szczecin) to conduct direct marketing using telecommunication end devices by sending to the telephone number given by me (in the form of voice calls as well as SMS/MMS messages) marketing and commercial information which constitutes at the same time the ordered commercial information referred to in Article 10 of the Act of 18 July, 2002, on the provision of services by electronic means (i.e. Journal of Laws from 2017, item 1219, as amended).
4. The User may, free of charge and at any time, withdraw their consent to the use by the Operator of the provided telephone number completely, or with limitation concerning the scope of withdrawal of the consent e.g. only for conducting direct marketing.

## 7. Forums, social networks and exchange of opinions between Users

1. The Operator provides the Website Users with the opportunity to exchange opinions on the use of the Website and the service provided through it, in particular through the use of Internet forums and closed or open groups on Facebook.
2. Any information about the Users (including personal data) disclosed by the Users themselves on the websites during the publication of comments or other forms of information exchange between the Users are available to all visitors of the websites containing such disclosed data. The Operator is not able to protect the data disclosed in this way against third parties, and the information about the Users may be used by said third parties to send unspecified information. For this reason, the Operator does not require the Users to disclose data about themselves (including personal data) when using the above mentioned platforms for exchange of information and opinions.

## 8. Principles of processing and protection of data concerning Users

1. The data concerning Users, in particular personal data, are processed by the Operator exclusively for the purpose for which they were collected, are subject to adequate protection and are made available to third parties only within the legally permitted limits.
2. Subject to items 9-12 below, personal data of the Users are made available to third parties only on the basis of an explicit, prior consent of the person to whom they refer.
3. The administrator of the Users' personal data is the Operator.

4. The Operator processes the personal data of the Users in accordance with the provisions of the Act of 29 August, 1997, on the protection of personal data (i.e. Journal of Laws from 2016, item 922, as amended) with the use of adequate technical and organizational measures. Personal data shall be duly protected against unauthorized access, corruption or destruction.
5. The Operator makes all the information required by the law available to the User in the content of the Privacy Policy before the User provides their personal data and gives their consent to their processing. A User may register or order a service on the Website only after they have made a statement on becoming acquainted with the Privacy Policy.
6. In order to make it easier for the User to find and identify the contents indicated in item 5, the Operator includes below a separate information for the persons from whom the personal data concerning them are collected: Information on the purposes and scope of the processing of personal data. In accordance with Article 24 sec. 1 of the Act of 29 August, 1997, on the protection of personal data (consolidated text: i.e. Journal of Laws from 2016, item 922, as amended) we inform that:
  - The Administrator of Personal Data within the meaning of the Act of 29 August 1997 on the protection of personal data (i.e. Journal of Laws from 2016, item 922, as amended) is Localize.pl Agencja Hofmann-Delbor Jacek Mikrut Spółka jawna, with its registered office in Szczecin, at ul. Smolańska 3, 70-026 Szczecin, NIP:9552385451, REGON 363371324, entered under the number 0000594783 into the Register of Entrepreneurs of the National Court Register kept by the District Court Szczecin - Centrum in Szczecin, 13th Commercial Division of the National Court Register.
  - Personal data are collected by the Administrator and will be processed by the Administrator or entities acting on their behalf in order to provide the ordered service in accordance with the rules of the Website, in accordance with the principles set out in the Privacy Policy and the Cookies Policy.
  - The recipients of the collected User data may be: entities conducting marketing campaigns of their services on the Administrator's order, entities cooperating with the Administrator in the organization of conferences and other industry events, banks and Internet payment operators and postal operators.
  - The Administrator or an entity acting on their behalf will process the



personal data also for direct marketing of their services. In the case of an obligation to obtain a permit to carry out specific marketing activities on the basis of special provisions, such activities will not be carried out without a separate consent of the User. • The User has the right to access the content of their personal data, and the right to correct them at any time, as well as the right to demand the cessation of processing of their data. • Personal data are provided by the User voluntarily.

7. The personal data may be accessed only by persons who are expressly authorized in writing by the Operator. An authorized person has an individual password for accessing personal data. The password is not made available to other persons and remains known only to the Operator and to the authorized person. Passwords are subject to periodical changes in accordance with the rules specified by the Operator. Password lists are stored in a place accessible only to the Operator.
8. The Operator informs that personal data may also be accessed by authorized state authorities within the scope of competences defined by relevant regulations, in particular by the justice system authorities (including the police, public prosecutor's office, courts).
9. The Operator may be obliged to provide information collected by the Website also to other authorized entities on the basis of lawful requests and to the extent resulting from the request.
10. Users' personal data may be made available by the Operator to the extent necessary:
  - *a) to operators of electronic payment systems;*
  - *b) to post operators;*
  - *c) to entities providing marketing services on behalf of the Operator, including services of personalization of contact with the User.*
11. The Operator shall allow the processing of personal data to be outsourced to third parties only to the extent necessary to provide accounting and IT services to the Operator. The Operator may also entrust the processing of personal data to entities

providing services within the scope of marketing of goods and services of the Operator on their order. The User may at any time obtain information about the entities entrusted with the processing of personal data, as well as about the purpose and scope of entrusting their processing.

12. The Operator shall provide each User with direct and permanent access to current information within the scope indicated in items 5-12, in particular informing the User of any changes in this respect. Access to information is provided by making the current wording of the Privacy Policy and the Cookies Policy available on the Website. In addition, the User may at any time obtain information and answers to questions via e-mail, and may make any statements or requests regarding the processing of their personal data this way. In particular, the User may at any time demand that the processing of their personal data be discontinued, their personal data be changed or corrected.

## 9. Cookies Policy.

1. The Operator's Website uses cookies.
2. Cookies are information technology data, in particular text files, which are stored in the end device of the Website User and are used for browsing the Website. Cookies usually contain the name of the website from which they originate, the length of time they are stored on the end device and a unique number.
3. The entity that places cookies on the Website User's end device and gains access to them is the Website Operator.
4. Cookies are used for the following purposes:

- *a. generation of statistics, which help us understand how Users use the Website, thus improving its structure and content;*
  - *b. maintaining the Website User's session (after logging in), thanks to which the User does not have to re-enter their credentials on every subpage of the Website;*
  - *c. defining the User's profile in order to display tailored materials in advertising networks, in particular the Google network.*
5. There are two main types of cookies used within the Website: session cookies and persistent cookies. Session cookies are temporary files that are stored on the User's end device until the User logs out, leaves the website or switches off the software (web browser). Persistent cookies are stored in the User's end device for the period specified in the parameters of cookie files or until they are deleted by the User.
  6. Web browsing software (the web browser) usually allows cookies to be stored on the User's end device by default. Website Users may change their settings in this respect. The web browser allows for deleting cookies. It is also possible to automatically block cookies. Detailed information in this regard can be found in the help section or the documentation of the web browser.
  7. The User should be aware that limiting or disabling the use of cookies may affect certain functionalities available on the Website.
  8. The cookies placed in the end device of the Website User may also be used by the advertisers and partners cooperating with the Website Operator.
  9. Cookies may be used by advertising networks, in particular Google, to display advertisements tailored to the manner in which the User uses the Website. For this purpose, they can store information about the User's navigation path or the time of staying on a given page.
  10. In terms of the information about the User's preferences collected by Google's advertising network, the User can view and edit the information resulting from cookies using the tool: <https://www.google.com/ads/preferences/>

11. If the User does not wish to receive cookies, they can change the settings of their browser. We reserve that disabling the use of the cookies necessary for the authentication, security and maintenance of User preferences may make it difficult, and in extreme cases may prevent the use of the websites.

## 10. Final provisions.

1. 1. The Privacy Policy together with the Cookies Policy have been in force since 25 November, 2017.
2. 2. The Operator reserves the right to change the Privacy Policy and the Cookies Policy at any time. After changes, the uniform text of the privacy policy and the cookie policy will be available on the main page of the Website under the tab "Privacy Policy". The Operator shall inform the Users about the planned change one week in advance, indicating the scope of the changes and the date of commencement. If the User does not accept the changes, the agreement for the provision of electronic services shall be terminated upon the expiry of the time limit specified in the notice. Any change to the Privacy and Cookies Policy will be visible in the "Privacy Policy" tab on the main page of the Website.