To ensure that users of this Service understand that the protection of their privacy is of utmost importance to us and to provide users with information about the personal data collected by the Service, the purpose of their collection, and the use of cookies, we present this privacy policy.

We guarantee privacy protection at a level that meets at least the standards set out in applicable legal regulations, particularly in 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 (the "GDPR"), the Act of 18 July 2002 on the provision of electronic services (Journal of Laws 2013.1422, as amended), the Act of 29 August 1997 on the protection of personal data (Journal of Laws 2015.2135, as amended), and the Act of 16 July 2004 - Telecommunications Law (Journal of Laws 2014.243, as amended). Data will be processed for the period during which a complaint or lawsuit can be filed, and also during the period in which the Administrator is obliged to process data based on laws. Data processed for direct marketing of our products and services will be processed until the client objects to their processing for this purpose.

- 1. Objectives of the adopted privacy policy and the use of cookies on the website.
- This Privacy Policy and the use of cookies regulate the rules of processing personal data, collecting, and using information about users on the website at <u>www.smart-call.app</u> (hereinafter referred to as the "Service"). It was created and adopted by Paweł Łaskawiec - Empiria Studio. The personal data administrator is Paweł Łaskawiec - Empiria Studio, located at ul. Niedźwiedzia 4/3b, 54-232 Wrocław, NIP: 9730958111.
- 3. The Administrator processes your personal data for the following purposes:
 - 1. fulfilling orders and tasks carried out by the entity,
 - 2. fulfilling legal obligations imposed on the entity,
 - 3. communication related to handling inquiries, orders, and tasks offered by the entity (phone contact, email, contact form on our service, etc.),
 - 4. handling complaints or other claims,
 - 5. analytical or statistical purposes,
 - 6. directing marketing content to you (providing marketing communication based on cookies, analytical data, and direct marketing).
- 4. By registering on the platform (You consent to receiving commercial information via electronic communication means sent by <u>www.smart-call.app</u> and to the use of email communication for marketing purposes), the user's personal data will also be processed by the Service to provide information about offers and to deliver newsletters containing information about offers. Providing personal data is voluntary. This provision can be changed in your user account after logging into the application.
- 5. We inform you that the Service may contain links that, when clicked, allow you to reach other websites managed by other administrators. The administrator of this Service has no influence on the privacy policies or cookie policies conducted by these administrators and is not responsible for them. Therefore, we urge users to familiarize themselves with the privacy policies and cookie policies of these services.
- 6. Data collected about users in the Service, including personal data and how they are used, and user rights.

When visiting our Service, data about the user can be shared in two ways: passively and actively.

1. Passively collected data are automatically recorded by the service: anonymous information about the user's visit time, IP address, URL address, browser type (system logs), number of visits, device data, browser language, operating system type.

Automatically collected data are analyzed for statistical purposes using the standard Google Analytics solution. This tool operates based on cookies and does not provide data that allows the user to be identified. The Google privacy policy is available at https://www.google.com/intl/pl/policies/privacy/.

The data collected in the manner described above are stored only for administrative purposes, enabling the efficient operation of the Service and the implementation of user-friendly solutions. We ensure that this information is not disclosed to anyone except those authorized to administer the Service.

- 2. Data collected by the Service also includes data actively provided by the user.
 - 1. For registration and login purposes. The data will be processed for the necessary period, but not longer than until the user objects.
 - 2. The Service allows contact with the relevant departments of the Service via email. This data is used solely for contact purposes, i.e., to provide an answer to the question asked by the user.
- 3. The user has the right to access the data processed by the Administrator, request their change, or deletion at any time. To do so, please send a request to help@smart-call.app.
- 4. The user can unsubscribe from the newsletter or subscription at any time. This can be done independently via the "Unsubscribe from the newsletter" option available in each message sent by the Service within the Newsletter, located under the text: If you no longer wish to receive information related to our offer, you can click the link and unsubscribe from our mailing list. Also, in the user's profile by unchecking the notification checkbox.
- 5. Cookies and how they are used

When using the Service, cookies are saved on the user's end device.

4. Security

The user's personal data is stored in a database that has technical and organizational measures ensuring the protection of processed data in accordance with the requirements set by legal regulations regarding personal data protection, particularly in 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 (the "GDPR"), the Act of 18 July 2002 on the provision of electronic services (Journal of Laws 2013.1422, as amended), the Act of 16 July 2004 - Telecommunications Law (Journal of Laws 2014.243, as amended).

The Service uses technologies and procedures for data protection that ensure proper protection of users' privacy. Only persons authorized by the data administrator have access to the database.

5. Changes in the privacy policy

Changes to the privacy policy will be made only to improve the standards of privacy protection or to adapt the policy to legal requirements. Each time, the user will be informed about the change via email if the user has agreed to be contacted in this way.

6. Rights under the GDPR

According to the GDPR – General Data Protection Regulation of 27.04.2016, the user has the right to:

- delete their data,
- limit the processing of their data,
- be anonymous,
- access their data and receive a copy,
- transfer data,
- object to data processing,
- correct their data,
- lodge a complaint with the supervisory authority the President of the Personal Data Protection Office,
- be notified of data breaches.

Data will not be transferred to a third country or any international organization.

According to Article 4, point 4 of the GDPR, data may be profiled.

7. Contact with the administrator and reporting irregularities

Please report any irregularities, comments, requests regarding the privacy policy to the address: help@smart-call.app. We assure you that each report will be considered, and we will respond to it at the email address provided in the report.

In case of irregularities related to the processing of personal data, the client has the right to report violations to the President of the Personal Data Protection Office.