

Privacy Policy

Privacy Policy – information clauses concerning the processing of personal data in relation to the use of websites or their services

This Privacy Policy contains information concerning the processing of personal data in relation to the use of websites maintained by XPLUS S.A. (XPLUS) or the services they make available

The Privacy Policy contains all the information required by the provisions of the 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 (GDPR).

The Privacy Policy also outlines some of the terms and conditions for using the websites and the services that they provide.

Information clauses concerning data processing are divided into groups depending on the website or the services used by the Internet user, as follows:

1. Visiting and browsing websites.
2. Contact with consultant and / or answer questions.
3. Newsletters, webinars, free materials to download.
4. Information about rights.
5. Cookies policy

1. Data processed in relation to the use of websites

a. Data: IP addresses, cookies, and other similar data about location, devices and user activity, including information about clicks on links.

b. The data are controlled by XPLUS in its capacity as the publisher of websites and the manager of IT systems that maintain them and support other services.

Contact details: ul. Puławska 435 A, 02-801 Warszawa; biuro@xplus.pl.

c. The data are processed in order to:

- i. ensure comfortable website use,
- ii. monitor violations,
- iii. inform about content and services provided by XPLUS,
- iv. manage refunds and secure claims,
- v. provide marketing campaigns,
- vi. customize ads and adapt content to user interests,
- vii. conduct statistics and perform quality and efficiency measurements,

d. The data are processed in order to achieve the above-mentioned goals, which follow from the legitimate interests of the controller or third parties.

e. The legitimate interests of the controller include the need to continually raise quality, increase availability and the number of people who visit the websites or use their services, including free of charge, as well as determination, investigation, enforcement of claims and defense against claims in court proceedings and against other state authorities if the claims result from the use of XPLUS services.

f. The controller may disclose the data to other parties only when requested to do so by legally authorized entities or where such disclosure is necessary to secure the aforementioned objectives, e.g. to entities that provide hosting and marketing tools.

g. The controller shall store the data only for such time as is necessary to secure the aforementioned goals, no longer than until an objection is filed against their processing or expiry of the period of limitation of investigation and enforcement of claims.

2. Data processed in relations to contact with a consultant and / or answering questions via the contact form, chat or free helpline

a. Data: name and surname, telephone number, e-mail address, version of the software used.

b. The data are controlled by XPLUS as addressee of queries.

Contact details: ul. Puławska 435 A, 02-801 Warszawa; biuro@xplus.pl.

c. The data are processed in order to:

i. manage queries,

ii. verification of the addressee of query and maintaining the continuity of correspondence,

iii. feedback contact according to preference,

iv. information on XPLUS content and services,

v. manage refunds and secure claims.

d. The data are processed in order to fulfil the contract or take action requested by the user before the signing of the contract, as well as to accomplish the above-mentioned goals that follow from the legitimate interests of the controller or third parties.

e. The legitimate interests of the controller include the need to continually raise quality, increase availability and the number of people who visit the websites or use their services, including free of charge, as well as determination, investigation, enforcement of claims and defense against claims in court proceedings and against other state authorities if the claims result from the use of XPLUS services.

f. The controller may disclose the data to other parties only when requested to do so by legally authorized entities or where such disclosure is necessary to secure the aforementioned objectives, e.g. to entities that provide hosting and webinar tools.

g. The controller shall store the data only for a time necessary to secure the aforementioned goals, no longer than until an objection is filed against their processing expiry of the period of limitation of investigation and enforcement of claims.

3. Data processed in relation to newsletter, e-books and webinars

a. Data: only the e-mail address may be processed in relation to newsletter, e-books and webinars subscriptions (if the user does not submit other data).

b. The data are controlled by XPLUS in its capacity as the publisher of websites and sender of commercial information.

Contact details: ul. Puławska 435 A, 02-801 Warszawa; biuro@xplus.pl.

- c. The data are processed in order to:
- i. send requested newsletters; verify eligibility to access certain content or services,
 - ii. send e-books,
 - iii. send information about webinars,
 - iv. advertise services XPLUS and communicate with the users ordering newsletter, e-books, webinars,
 - v. customize ads and tailor content to user interests,
 - vi. conduct statistics and perform quality and efficiency measurements,
 - vii. manage refunds and secure claims.
- d. The data are processed in order to fulfil the contract or take action requested by the user before the signing of the contract (objective outlined in c.i. and c.v.), as well as to accomplish the above-mentioned goals that follow from the legitimate interests of the controller or third parties.
- e. The legitimate interests include the need to raise quality, improve the availability and attractiveness of newsletters, e-books, webinars and other information services provided by XPLUS as well as determination, investigation, enforcement of claims and defense against claims in court proceedings and against other state authorities if the claims result from the use of XPLUS services.
- f. The controller may disclose the data to other parties only when requested to do so by legally authorized entities or where such disclosure is necessary to secure the aforementioned objectives, e.g. to entities that provide hosting and webinar tools.
- g. The controller shall store the data only for a time necessary to secure the aforementioned goals, no longer than until an objection is filed against their processing expiry of the period of limitation of investigation and enforcement of claims.

4. Users whose personal data are processed have the following rights:

- i. to request access to their data,
- ii. to request that their data are corrected,
- iii. to request that their data are erased,
- iv. to request that their data are transferred,
- v. to request that the processing of their data is limited,
- vi. to not be subject to automated decision-making, including profiling,
- vii. to file an objection to the processing of their data,
- viii. to file a complaint with respect to data processing with the appropriate supervisory body.

Should you have any queries or comments with regard to data processing on websites or in relation to services that they make available, do not hesitate to contact the data controller at biuro@xplus.pl.

5. Cookies policy

a. XPLUS may use cookies, i.e. information saved by servers on user's terminal which servers can read each time they use this playback device.

Cookies shall be understood as IT data, including without limitation text files, stored on users' terminals with the purpose of using websites. These files make it possible to recognise a user's

terminal and display a website in a relevant way, adapted to user's preferences. Cookies usually contain a website name they come from, time of being stored on the terminal and a unique number.

b. Cookies are used to:

i. adapting contents of websites to user's preferences and optimising the use of websites; in particular, these files allow to recognize the user's terminal and properly display the website, tailored to his individual preferences;

ii. prepare anonymous, aggregate statistics which help us understand how a user benefits from websites, which allows for improvement of their structure and contents;

iii. providing users with content more tailored to their interests;

iv. promoting XPLUS on social networks.

c. XPLUS use the following types of cookies:

i. cookies absolutely indispensable for correct operations of a website or features to be used by a user;

ii. cookies used to ensure security,

iii. cookies enabling the collection of information on how to use XPLUS websites;

iv. cookies enabling "remembering" user-selected settings and personalizing the user interface,

v. cookies enabling users to provide advertising content more tailored to their interests.

d. In general, an application used to browse through websites allows for saving cookies on a terminal by default. These settings may be changed so that automatic management of cookies is blocked in web browser settings or a user is informed each time cookies are sent to his terminal. Detailed information on the possibility and ways of dealing with cookies is available in application (web browser) settings. Limitation of using cookies may affect some features available on a website.