

PRIVACY POLICY

MOBILE APP Stretchme

I. GENERAL PROVISIONS

1. The administrator of personal data is StretchMe Sp. z o. o. with its registered office in Kraków, at ul. Lubomirskiego 20, 31-509 Kraków, entered into the Register of Entrepreneurs kept by the District Court for Kraków Śródmieście in Kraków, 11th Commercial Division of the National Court Register under the number KRS 0000881960, NIP 5213919480, REGON 388143664, share capital in the amount of PLN 10,000.00 (hereinafter referred to as "**administrator**").
2. Personal data of persons using the Administrator's application (hereinafter "**App**") or from the services provided by the Administrator (hereinafter "**Service**") (next "**Users**") are processed in compliance with the principles provided for in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 /WE (general regulation on data protection, hereinafter referred to as "GDPR"), as well as provided for in the Polish Act on the Protection of Personal Data, executive acts to this Act and the Act on the provision of electronic services of July 18, 2002 (Journal of Laws of 2002, No. 144, item 1204, as amended).
3. Personal data is any information about an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, e-mail address, identification number, location data, online identifier or one or more factors specific to the physical, physiological genetic, mental, economic, cultural or social identity of a natural person.
4. The processing of personal data is, in principle, any activity performed on personal data, regardless of whether it is performed in an automated or non-automated manner, including e.g. collecting, storing, recording, organizing, modifying, viewing, using, sharing, limiting, deleting or destruction.
5. The Administrator kindly asks Users to read this Privacy Policy carefully before using the Application or Services.
6. Downloading, installing and using the Application is tantamount to the User's consent to the collection, use and transfer of the User's personal data for processing in the manner described in this Privacy Policy. If the User decides not to provide the Administrator with his personal data, then the User will not be able to fully use the Services.

II. LEGAL BASIS FOR DATA PROCESSING

1. The legal basis for the processing of personal data by the Administrator in order to:

- 1) creating a User account, is art. 6 sec. 1 lit. a GDPR, i.e. the User's consent to data processing;
 - 2) implementation of activities aimed at the conclusion and implementation of the Service, is art. 6 sec. 1 lit. b of the GDPR, i.e. taking actions necessary to conclude a contract the subject of which is the provision of the Service and the need for its implementation by the Administrator for the benefit of a given User;
 - 3) for the provision of the Service, in the field of biometric data (activity and physical fitness features and image) and health data, is art. 9 sec. 2 lit. a GDPR, i.e. the User's express consent to data processing and art. 9 sec. 2 lit. f GDPR, i.e. processing is necessary to establish the pursuit or defense of claims by the Administrator;
 - 4) ordering the Administrator's newsletter, is art. 6 sec. 1 lit. a GDPR, i.e. the User's express consent to data processing;
 - 5) consent to the collection of location data using the functionality of the User's mobile devices, is art. 6 sec. 1 lit. a GDPR, i.e. the User's consent to data processing;
 - 6) necessary to fulfill the legal obligations incumbent on the Administrator, is art. 6 sec. 1 lit. c GDPR, i.e. the fulfillment of the Administrator's obligations under the law regarding the Administrator's activities, in particular on the basis of accounting and tax regulations;
 - 7) necessary to fulfill the Administrator's legitimate interests, including conducting marketing activities and advertising campaigns of the Administrator's Services by electronic means or by telephone on the basis of a separate consent expressed by the User in accordance with art. 6 sec. 1 lit. a GDPR, i.e. the User's express consent to the processing of this data;
 - 8) necessary to implement the legitimate interests of the Administrator or third parties, is art. 6 sec. 1 lit. f of the GDPR, i.e. due to legally justified purposes pursued by the Administrator, in particular to establish, pursue or defend claims, the Administrator's internal administrative purposes, including analyses, statistics and internal reporting of the Administrator.
2. The Administrator processes personal data provided voluntarily by Users and data collected automatically in the scope of using the Application in accordance with art. 6 sec. 1 lit. a GDPR, i.e. the User's consent to the processing of data and art. 6 sec. 1 lit. f of the GDPR, i.e. due to legally justified purposes pursued by the Administrator, in particular for the purpose of direct marketing of the Administrator's Services, as well as to optimize, improve and personalize the Application's functions and to create statistics. The administrator ensures that such processing will not violate the rights and freedoms of data subjects.
 3. Personal data provided voluntarily by the User are not combined with automatically collected data on how the User uses the Application. The Administrator informs that such a connection may occur for technical reasons, however, in such a situation, the data combined in this way will be processed by the Administrator only for legally justified purposes pursued by the Administrator, in particular in order to optimize, improve and personalize the Application's functions and to create statistics for the Administrator's internal needs.

4. With separate consents of the User, his personal data may be processed in order to send him commercial information about the Administrator's Services by electronic means. The user has the right at any time to request the cessation of sending him commercial information by electronic means or the cessation of using his telephone number for direct marketing purposes.
5. Users' personal data will be processed for the period necessary to achieve the processing purposes indicated above, i.e.:
 - 1) in the case of consent by the User - until it is withdrawn;
 - 2) in the scope of the implementation of activities aimed at the conclusion and implementation of the Service at the User's request - until their completion, and after that time - in the scope of establishing, pursuing or defending claims with these activities - until the expiry of the limitation period for these claims specified by law;
 - 3) in the scope of the provision of the Service at the User's request - until their completion, and after that time - in the scope of establishing, pursuing or defending claims with these activities - until the expiry of the limitation period for these claims specified by law;
 - 4) in the scope of fulfilling the legal obligations incumbent on the Administrator in connection with the conduct of business and the provision of Services - for the periods indicated in the relevant provisions of law regarding the conduct of business by the Administrator, in particular:
 - a) for tax documentation - for a period of 5 years from the end of the calendar year in which the tax payment deadline expired,
 - b) for accounting documentation - for a period of 5 years from the end of the calendar year in which operations, transactions and proceedings were finally completed, repaid, settled or expired;
 - 5) in the event that the processing takes place for purposes resulting from legitimate interests pursued by the Administrator or third parties - until their implementation, or until the User objects to such processing, unless there are legally justified grounds for further processing of User's data by the Administrator ;
 - 6) in the event that the processing takes place for the Administrator's marketing purposes by e-mail or telephone, they will be processed until the relevant consents are withdrawn, if any;
 - 7) in the scope of information necessary to handle complaints, they will be processed until the expiry of the rights in this respect;
 - 8) in the case of processing for archiving purposes, they will be processed for 3 years from the end of the provision of the Services.

III. PURPOSE AND SCOPE OF COLLECTING PERSONAL DATA AND RECIPIENTS OF DATA

1. Each time, the purpose of processing, the scope of personal data and possible recipients of the User's personal data, who provides the data for processing to the Administrator, result from the User's consent or legal provisions, additionally, the data may be clarified as a result of

- actions taken by the User in the Application or other channels of communication with the User.
2. The administrator takes special care to protect the rights and freedoms of persons whose data he processes, and in particular ensures that the data collected by him are processed:
 - 1) in accordance with the law, fairly and in a transparent manner for the person to whom they relate (lawfulness, fairness and transparency);
 - 2) for specific, explicit and legitimate purposes and are not further processed in a manner incompatible with these purposes (purpose limitation);
 - 3) adequate, relevant and limited to what is necessary for the purposes for which they are processed (data minimization);
 - 4) correctly, and if necessary, personal data is updated (correctness);
 - 5) in a form that allows identification of the data subject for a period not longer than it is necessary for the purposes for which the data is processed (storage limitation);
 - 6) in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organizational measures (integrity and confidentiality).
 3. Resulting from the purposes of personal data processing, the User provides the following data:
 - 1) identity data - name, surname, gender;
 - 2) contact details - e-mail address, delivery address, billing address, telephone number;
 - 3) financial data - bank account and payment card details;
 - 4) transaction data - details of payments to and from the User and other details of products and Services purchased from the Administrator;
 - 5) technical data - internet protocol (IP) address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform and other technologies on devices used by the User to access the Application;
 - 6) profile data - username (login) and password, purchases or orders made by the user, preferences, opinions and answers to surveys;
 - 7) usage data - information on how to use the Application, products and Services;
 - 8) marketing and communication data - preferences for receiving marketing from the Administrator.
 4. The Administrator also processes special categories of personal data provided with the express consent of the User:
 - 1) biometric data - features of activity and physical fitness and image;
 - 2) health data.
 5. The Administrator's application and Services may provide the Administrator with device identifiers, location data. Device identifiers include identifiers related to mobile device media such as IMEI number, platform specific identifiers such as Apple IDFA; and identifiers that are part of your device's hardware, such as the WiFi MAC address and serial number. The exact information about what device identifiers are sent may depend on your mobile device platform and operating system version. Location data, in turn, can be obtained from GPS services, based on the triangulation of cell phone towers or a known location

nearby WiFi access points. The administrator may use identifiers for the strictly necessary purposes specified in section II in points 1 and 2 above.

6. The application is not intended for persons under the age of 16. The administrator does not knowingly collect information about persons under the age of 16. If the User believes that the Administrator unintentionally collected such information, he should notify the Administrator about it at the following e-mail address: kontakt@stretchme.pl, in order to enable the Administrator to remove this information.
7. The provision of personal data by the User is voluntary. The User may not provide his personal data, however, in this case the Administrator may not be able to provide Services to the User. Due to the nature of some Services, the User may be asked to provide additional personal data. The scope of additional personal data will be indicated by the Administrator.
8. The purposes of collecting the User's personal data by the Administrator are set out in section II, points 1 and 2 above.
9. In connection with the processing of data for the purposes indicated in section II in points 1 and 2, Users' personal data may be made available to other recipients of personal data. The recipients of Users' personal data may be in particular:
 - 1) employees, associates of the Administrator;
 - 2) other entities authorized to receive Users' personal data on the basis of relevant legal provisions;
 - 3) entities that process Users' personal data on behalf of the Administrator on the basis of a personal data processing agreement concluded with the Administrator (so-called processors), e.g. providing IT services, payment services, accounting services, legal services and other services supporting the conduct of business by administrator.
10. The entities entrusted with the processing of personal data⁸ are obliged to comply with the principles of confidentiality and security of personal data, in particular not to disclose personal data to unauthorized persons, and to apply physical and technical security measures adequate to the method of processing such data. The Administrator provides the User, at his request, with detailed information about the entity entrusted with data processing, the scope of entrusted personal data for processing and the date of their transfer. In addition, in this mode, the Administrator also provides access to current and detailed information about the technical means used or made available by the Administrator to prevent the acquisition and modification by unauthorized persons of personal data sent by the User electronically.
11. When running the Application, the Administrator uses tools provided by external entities. User data may be transferred outside the European Economic Area (EEA). Personal data may only be transferred to such third countries (countries outside the EEA) or entities in third countries for which the European Commission has found an adequate level of data protection, standard data protection clauses have been applied in contracts with these entities or appropriate other safeguards have been applied, referred to in generally applicable laws. In connection with the transfer of data outside the EEA

The User may request further information about the security measures applied in this regard, obtain a copy of these security measures or information about the place where they are made available by contacting the Administrator.

12. The User's personal data will not be sold or transferred to third parties for purposes other than those described above.

IV. USER RIGHTS

1. Each User whose personal data is processed by the Administrator is entitled to:
 - 1) the right to access the data content. This is the right to obtain confirmation from the Administrator whether it processes the User's personal data and the right to access such data (including their copies), and in particular to the following information:
 - a) about the purposes of processing the User's personal data,
 - b) about the categories of processed personal data,
 - c) information about the recipients or categories of recipients to whom the Administrator has disclosed the User's personal data or to whom it intends to disclose such data,
 - d) about the possibility of exercising the right in the field of personal data protection and how to exercise these rights,
 - e) about the right to lodge a complaint with the supervisory authority,
 - f) on automated decision-making, including profiling, as well as on the consequences of such processing for the User, unless it concerns the processing of personal data for the purposes of counteracting money laundering and financing terrorism and counteracting other crimes;
 - 2) the right to rectify the data. This is the right to request the Administrator to immediately rectify the User's personal data that is incorrect and to request completion of incomplete personal data;
 - 3) the right to delete data. This is the right to request the Administrator to immediately delete personal data concerning the User (also referred to as the "right to be forgotten"). In such a situation, the Administrator is obliged to delete the User's personal data, provided that one of the following conditions is met:
 - a) personal data are no longer necessary for the purposes for which they were collected,
 - b) the consent on which the processing is based has been withdrawn and the Administrator has no other legal basis for the processing,
 - c) personal data has been processed unlawfully,
 - d) personal data must be deleted in order to comply with a legal obligation.

It is not possible to exercise the right to delete personal data if the Administrator is obliged under the law to further process personal data to the extent specified by the relevant provisions of law or for the purposes necessary to establish, pursue or defend claims;

- 4) the right to limit data processing. This is the right to request the Administrator to limit the processing of the User's personal data when:

- a) The User questions the correctness of the personal data processed by the Administrator,

- b) the processing of the User's personal data is unlawful and the User opposes the removal of his personal data,
- c) The Administrator no longer needs the User's personal data, but the User needs them to establish, pursue or defend claims.

In the event of exercising the right to limit the processing of personal data, the Administrator may process the User's personal data, with the exception of their storage, only with the User's consent or in order to establish, pursue or defend claims or to protect the rights of another natural or legal person or due to important considerations of public interest;

- 5) the right to data portability. This is the right to receive in a structured, commonly used machine-readable format personal data provided to the Administrator by the User and the right to request the transfer of personal data to another data administrator, if technically possible. This right is granted if the following conditions are met jointly:

- a) the processing is carried out in an automated manner,
- b) the data is processed on the basis of consent or on the basis of a contract.

However, if the data to be transferred at the User's request is a secret of the Administrator's enterprise, then the Administrator has the right to refuse the User's request to transfer such data, of which he will be informed;

- 6) the right to object to data processing. The User has the right to object at any time - for reasons related to the User's particular situation - to the processing of data based on the Administrator's legitimate interest (i.e. pursuant to Article 6(1)(f) of the GDPR), including profiling. In such a situation, the Administrator will not be able to further process the data for these purposes, unless there are valid legally justified grounds for processing or the data is needed by the Administrator to establish, pursue or defend claims. If the User's personal data is processed for the purposes of direct marketing, the User has the right to object at any time to the processing for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing. Then the Administrator will not be allowed to process the User's personal data for such purposes.

- 2. In cases where the processing of the User's personal data is based on the user's consent (Article 6(1)(a) of the GDPR), the User has the right to withdraw this consent at any time, without affecting the lawfulness of the processing carried out on based on consent before its withdrawal.
- 3. Providing data by the User is voluntary, however, the consequence of not providing the necessary data will be the inability to take action consisting in contacting the Administrator with the User or aimed at concluding and providing Services with the Administrator at the User's request.
- 4. The processing of the User's personal data may be carried out in an automated manner, which may involve profiling. Profiling consists in creating a User profile, using computer algorithms, based on information held by the Administrator in order to identify the possible characteristics and preferences of the User. Actions

these will be used by the User to prepare and present the offer/marketing information best suited to the User's needs.

5. Withdrawal of consent or objection to the processing of personal data takes place by sending a message to the Administrator's e-mail address: kontakt@stretchme.pl
6. After withdrawing consent or expressing an objection, the User's personal data will no longer be processed for the purposes for which they were provided. The User may change / supplement personal data by sending an appropriate request to the Administrator's e-mail address: kontakt@stretchme.pl
7. In cases where it is recognized that the processing of the User's personal data by the Administrator violates the provisions of the GDPR, the User has the right to lodge a complaint with the supervisory body (in Poland, it is the President of the Office for Personal Data Protection).
8. Contact with the person supervising the processing of personal data in the Administrator's organization is possible by electronic means at the following e-mail address: kontakt@stretchme.pl

V. CONTACT WITH THE ADMINISTRATOR

1. The User may at any time directly contact the Administrator by sending an appropriate message in writing or by e-mail to the Administrator's address, i.e.:
 - 1) in writing to the following address: Mlocarni 69, 02-967 Warsaw
 - 2) electronically to the e-mail address: kontakt@stretchme.pl
2. The Administrator stores correspondence with the User for statistical purposes and for the best and fastest response to emerging inquiries, as well as for the purpose of settling complaints and possible decisions on administrative interventions regarding the indicated data made on the basis of reports. Addresses and data collected in this way will not be used to communicate with the User for purposes other than the implementation of the application.
3. Any User's requests for the Administrator to perform activities related to personal data will be performed by the Administrator after prior verification of the User. For this purpose, it reserves the right to ask the User again to confirm his data, including personal data, e.g. in the form of name, surname, e-mail address, etc. The above applies to the same data, including personal data, that were previously provided by the User and for the processing of which the User consented. Providing this data is not mandatory, but it may be necessary to perform activities or obtain information requested by the User.

WE. SECURITY

1. The administrator applies appropriate technical and organizational measures to ensure the security of protection of personal data being processed, adequate to the threats and categories of personal data protected, and in particular, protects data against unauthorized access, inspection or removal by an authorized person, processing in violation of applicable regulations and change, loss, damage or destruction.
2. Taking into account the state of technical knowledge, the cost of implementation and the nature, scope, context and purposes of processing as well as the risk of violating the rights or freedoms of

natural persons with varying probability and severity of the threat, the Administrator implements appropriate measures

technical and organizational to ensure a level of security appropriate to this risk, including, where applicable, including:

- 1) the ability to ensure the confidentiality, integrity, availability and resilience of processing systems and services at all times;
- 2) the ability to quickly restore the availability and access to personal data in the event of a physical or technical incident;
- 3) regular tests, measurements and assessments of the effectiveness of technical and organizational measures to ensure the security of processing.

VII. FINAL PROVISIONS

1. In order to make the Application even more attractive to the User, the Administrator uses "cookies". A "cookie" file is a small file containing a string of characters that is sent to the User's computer when using the Application. Information collected automatically using "cookies" allows you to adjust the services and content offered by the Administrator to the individual needs and preferences of the User, as well as to develop general statistics on the use of the Application by the User. Thanks to the cookie. The User's browser can be recognized by websites belonging to the Administrator. Most of the "cookies" used by the Administrator are deleted from the User's hard drive after the end of the session ("session cookies"). Other "cookies" remain on the User's computer to enable recognition of the User's computer during the next visit ("persistent cookies"). Disabling the option by the User that allows saving "cookies" in the web browser may make it difficult or impossible to use the Application.
2. Bearing in mind the fact that the market of ICT network monitoring services is developing extremely dynamically, the Administrator tries to inform Users about the use of services of new entities in this respect, and the User agrees that in the future it may also be other companies. At the same time, the Administrator informs that the User may withdraw his consent in this regard at any time by changing the settings of his browser.
3. The detailed rules of the "cookies" policy are made public by the Administrator and can be found at <https://www.app.stretchme.app/pdfs/cookies-policy.pdf>
4. Links may be placed in the Application (e.g. in the form of third party logos), which, if activated, redirect the User to an external website. The Administrator is in no way responsible for the effects of such redirects and has no influence on the content of such websites. The Administrator is not responsible for the content of the privacy and security policies in force on these websites, or for the "cookies" used when browsing them. We encourage Users using such links to familiarize themselves with the content of the relevant legal documents applicable on these websites.
5. Services and functions within the Application may be expanded over time, which means that the Administrator reserves the right to make changes to this Privacy Policy, while maintaining the rights previously acquired by Users. The Privacy Policy applies to each User. Changes may occur e.g. for the following important reasons:
 - 1) amending applicable regulations, in particular in the field of personal data protection, telecommunications law, services provided electronically and regulating rights

consumers, affecting the rights and obligations of the Administrator or the rights and obligations of Users;

- 2) development of functionalities or Services dictated by the progress of Internet technology, including the use/implementation of new technological or technical solutions affecting the scope of the Privacy Policy.
6. The Administrator will each time place within the Application information about changes to the Privacy Policy. With each change, a new version of the Privacy Policy will be made available to the public in the Application with a new date. Archival Privacy Policies can be found at <https://www.app.stretchme.app/pdfs/>
 7. In the event of doubts or conflicts between the Privacy Policy and the consents granted by the User for the processing of personal data, regardless of the provisions of the Privacy Policy, the basis for undertaking and determining the scope of activities by the Administrator are always the consents voluntarily granted by the User or the law.

PRIVACY POLICY

WEB PAGE

"www.stretchem.pl" and "www.stretchme.app"

VIII. GENERAL PROVISIONS

7. The administrator of personal data is StretchMe Sp. z o. o. with its registered office in Kraków, at ul. Lubomirskiego 20, 31-509 Kraków, entered into the Register of Entrepreneurs kept by the District Court for Kraków Śródmieście in Kraków, 11th Commercial Division of the National Court Register under the number KRS 0000881960, NIP 5213919480, REGON 388143664, share capital in the amount of PLN 10,000.00 (hereinafter referred to as "**administrator**").
8. Personal data of persons using the Administrator's website and online platform (hereinafter "**Portal**") or from the services provided by the Administrator (hereinafter "**Service**") (next "**Users**") are processed in compliance with the principles provided for in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 /WE (general regulation on data protection, hereinafter referred to as "GDPR"), as well as provided for in the Polish Act on the Protection of Personal Data, executive acts to this Act and the Act on the provision of electronic services of July 18, 2002 (Journal of Laws of 2002, No. 144, item 1204, as amended).
9. Personal data is any information about an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, e-mail address, identification number, location data, online identifier or one or more factors specific to the physical, physiological genetic, mental, economic, cultural or social identity of a natural person.
10. The processing of personal data is, in principle, any activity performed on personal data, regardless of whether it is performed in an automated or non-automated manner, including, for example, collecting, storing, recording, organizing, modifying, viewing, using, sharing, limiting, deleting or destruction.
11. The Administrator kindly asks Users to carefully read the content of this Privacy Policy before using the Portal or Services.

IX. LEGAL BASIS FOR DATA PROCESSING

1. The legal basis for the processing of personal data by the Administrator in order to:
 - 1) creating a User account, is art. 6 sec. 1 lit. a GDPR, i.e. the User's consent to data processing;
 - 2) implementation of activities aimed at the conclusion and implementation of the Service, is art. 6 sec. 1 lit. b of the GDPR, i.e. taking actions necessary to conclude a contract the subject of

which is the provision of the Service and the need for its implementation by the Administrator for the benefit of a given User;

- 3) for the provision of the Service, in the field of biometric data (activity and physical fitness features and image) and health data, is art. 9 sec. 2 lit. a GDPR, i.e. the User's express consent to data processing and art. 9 sec. 2 lit. f GDPR, i.e. processing is necessary to establish the pursuit or defense of claims by the Administrator;
 - 4) ordering the Administrator's newsletter, is art. 6 sec. 1 lit. a GDPR, i.e. the User's express consent to data processing;
 - 5) necessary to fulfill the legal obligations incumbent on the Administrator, is art. 6 sec. 1 lit. c GDPR, i.e. the fulfillment of the Administrator's obligations under the law regarding the Administrator's activities, in particular on the basis of accounting and tax regulations;
 - 6) necessary to fulfill the Administrator's legitimate interests, including conducting marketing activities and advertising campaigns of the Administrator's Services by electronic means or by telephone on the basis of a separate consent expressed by the User in accordance with art. 6 sec. 1 lit. a GDPR, i.e. the User's express consent to the processing of this data;
 - 7) necessary to implement the legitimate interests of the Administrator or third parties, is art. 6 sec. 1 lit. f of the GDPR, i.e. due to legally justified purposes pursued by the Administrator, in particular to establish, pursue or defend claims, the Administrator's internal administrative purposes, including analyses, statistics and internal reporting of the Administrator.
2. The Administrator processes personal data provided voluntarily by Users and data collected automatically in the scope of using the Portal in accordance with art. 6 sec. 1 lit. a GDPR, i.e. the User's consent to the processing of data and art. 6 sec. 1 lit. f of the GDPR, i.e. due to legally justified purposes pursued by the Administrator, in particular for the purpose of direct marketing of the Administrator's Services, as well as in order to optimize, improve and personalize the Portal's functions and to create statistics. The administrator ensures that such processing will not violate the rights and freedoms of data subjects.
 3. Personal data provided voluntarily by the User are not combined with automatically collected data on the way the User uses the Portal. The Administrator informs that such a connection may occur for technical reasons, however, in such a situation, the data combined in this way will be processed by the Administrator only for legally justified purposes pursued by the Administrator, in particular in order to optimize, improve and personalize the Portal's functions and to create statistics for the Administrator's internal needs.
 4. With separate consents of the User, his personal data may be processed in order to send him commercial information about the Administrator's Services by electronic means. The user has the right at any time to request the cessation of sending him commercial information by electronic means or the cessation of using his telephone number for direct marketing purposes.
 5. Users' personal data will be processed for the period necessary to achieve the processing purposes indicated above, i.e.:
 - 1) in the case of consent by the User - until it is withdrawn;

- 2) in the scope of the implementation of activities aimed at the conclusion and implementation of the Service at the User's request - until their completion, and after that time - in the scope of establishing, pursuing or defending claims with these activities - until the expiry of the limitation period for these claims specified by law;
- 3) in the scope of the provision of the Service at the User's request - until their completion, and after that time - in the scope of establishing, pursuing or defending claims with these activities - until the expiry of the limitation period for these claims specified by law;
- 4) in the scope of fulfilling the legal obligations incumbent on the Administrator in connection with the conduct of business and the provision of Services - for the periods indicated in the relevant provisions of law regarding the conduct of business by the Administrator, in particular:
 - a) for tax documentation - for a period of 5 years from the end of the calendar year in which the tax payment deadline expired,
 - b) for accounting documentation - for a period of 5 years from the end of the calendar year in which operations, transactions and proceedings were finally completed, repaid, settled or expired;
- 5) in the event that the processing takes place for purposes resulting from legitimate interests pursued by the Administrator or third parties - until their implementation, or until the User objects to such processing, unless there are legally justified grounds for further processing of User's data by the Administrator ;
- 6) in the event that the processing takes place for the Administrator's marketing purposes by e-mail or telephone, they will be processed until the relevant consents are withdrawn, if any;
- 7) in the scope of information necessary to handle complaints, they will be processed until the expiry of the rights in this respect;
- 8) in the case of processing for archiving purposes, they will be processed for 3 years from the end of the provision of the Services.

X. PURPOSE AND SCOPE OF COLLECTING PERSONAL DATA AND RECIPIENTS OF DATA

1. Each time, the purpose of processing, the scope of personal data and possible recipients of the User's personal data, who submits the data for processing to the Administrator, result from the User's consent or legal provisions, additionally, the data may be clarified as a result of actions taken by the User on the Portal or as part of other communication channels with the User.
2. The administrator takes special care to protect the rights and freedoms of persons whose data he processes, and in particular ensures that the data collected by him are processed:
 - 1) in accordance with the law, fairly and in a transparent manner for the person to whom they relate (lawfulness, fairness and transparency);
 - 2) for specific, explicit and legitimate purposes and are not further processed in a manner incompatible with these purposes (purpose limitation);

- 3) adequate, relevant and limited to what is necessary for the purposes for which they are processed (data minimization);
 - 4) correctly, and if necessary, personal data is updated (correctness);
 - 5) in a form that allows identification of the data subject for a period not longer than it is necessary for the purposes for which the data is processed (storage limitation);
 - 6) in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organizational measures (integrity and confidentiality).
3. Resulting from the purposes of personal data processing, the User provides the following data:
- 1) identity data - name, surname, gender;
 - 2) contact details - e-mail address, delivery address, billing address, telephone number;
 - 3) financial data - bank account and payment card details;
 - 4) transaction data - details of payments to and from the User and other details of products and Services purchased from the Administrator;
 - 5) technical data - internet protocol (IP) address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform and other technologies on devices used by the User to access the Portal;
 - 6) profile data - username (login) and password, purchases or orders made by the user, preferences, opinions and answers to surveys;
 - 7) usage data - information on how to use the Portal, products and Services;
 - 8) marketing and communication data - preferences for receiving marketing from the Administrator.
4. The Administrator also processes special categories of personal data provided with the express consent of the User:
- 1) biometric data - features of activity and physical fitness and image;
 - 2) health data.
5. The Portal is not intended for persons under the age of 16. The administrator does not knowingly collect information about persons under the age of 16. If the User believes that the Administrator has unintentionally collected such information, he should notify the Administrator about it at the following e-mail address: kontakt@stretchme.pl in order to enable the Administrator to remove this information.
6. The provision of personal data by the User is voluntary. The User may not provide his personal data, however, in this case the Administrator may not be able to provide Services to the User. Due to the nature of some Services, the User may be asked to provide additional personal data. The scope of additional personal data will be indicated by the Administrator.
7. The purposes of collecting the User's personal data by the Administrator are set out in section II, points 1 and 2 above.
8. In connection with the processing of data for the purposes indicated in section II in points 1 and 2, Users' personal data may be made available to other recipients of personal data. The recipients of Users' personal data may be in particular:

1) employees, associates of the Administrator;

- 2) other entities authorized to receive Users' personal data on the basis of relevant legal provisions;
 - 3) entities that process Users' personal data on behalf of the Administrator on the basis of a personal data processing agreement concluded with the Administrator (so-called processors), e.g. providing IT services, payment services, accounting services, legal services and other services supporting the conduct of business by administrator.
9. The entities entrusted with the processing of personal data⁸ are obliged to comply with the principles of confidentiality and security of personal data, in particular not to disclose personal data to unauthorized persons, and to use physical and technical security measures adequate to the method of processing such data. The Administrator provides the User, at his request, with detailed information about the entity entrusted with data processing, the scope of entrusted personal data for processing and the date of their transfer. In addition, in this mode, the Administrator also provides access to current and detailed information about the technical means used or made available by the Administrator to prevent the acquisition and modification by unauthorized persons of personal data sent by the User electronically.
10. When running the Portal, the Administrator uses tools provided by external entities. User data may be transferred outside the European Economic Area (EEA). Personal data may only be transferred to such third countries (countries outside the EEA) or entities in third countries for which the decision of the European Commission has found an adequate level of data protection, standard data protection clauses have been applied in contracts with these entities or appropriate other safeguards have been applied, referred to in generally applicable laws. In connection with the transfer of data outside the EEA, the User may request further information about the security measures applied in this regard, obtain a copy of these security measures or information about the place where they are made available by contacting the Administrator.
11. The User's personal data will not be sold or transferred to third parties for purposes other than those described above.

XI. USER RIGHTS

1. Each User whose personal data is processed by the Administrator is entitled to:
 - 1) the right to access the data content. This is the right to obtain confirmation from the Administrator whether it processes the User's personal data and the right to access such data (including their copies), and in particular to the following information:
 - a) about the purposes of processing the User's personal data,
 - b) about the categories of processed personal data,
 - c) information about the recipients or categories of recipients to whom the Administrator has disclosed the User's personal data or to whom it intends to disclose such data,
 - d) about the possibility of exercising the right in the field of personal data protection and how to exercise these rights,
 - e) about the right to lodge a complaint with the supervisory authority,

- f) on automated decision-making, including profiling, as well as on the consequences of such processing for the User, unless it concerns the processing of personal data for the purposes of counteracting money laundering and financing terrorism and counteracting other crimes;
- 2) the right to rectify the data. This is the right to request the Administrator to immediately rectify the User's personal data that is incorrect and to request completion of incomplete personal data;
- 3) the right to delete data. This is the right to request the Administrator to immediately delete personal data concerning the User (also referred to as the "right to be forgotten"). In such a situation, the Administrator is obliged to delete the User's personal data, provided that one of the following conditions is met:
 - a) personal data are no longer necessary for the purposes for which they were collected,
 - b) the consent on which the processing is based has been withdrawn and the Administrator has no other legal basis for the processing,
 - c) personal data has been processed unlawfully,
 - d) personal data must be deleted in order to comply with a legal obligation.

It is not possible to exercise the right to delete personal data if the Administrator is obliged under the law to further process personal data to the extent specified by the relevant provisions of law or for the purposes necessary to establish, pursue or defend claims;

- 4) the right to limit data processing. This is the right to request the Administrator to limit the processing of the User's personal data when:
 - a) The User questions the correctness of the personal data processed by the Administrator,
 - b) the processing of the User's personal data is unlawful and the User opposes the removal of his personal data,
 - c) The Administrator no longer needs the User's personal data, but the User needs them to establish, pursue or defend claims.

In the event of exercising the right to limit the processing of personal data, the Administrator may process the User's personal data, with the exception of their storage, only with the User's consent or in order to establish, pursue or defend claims or to protect the rights of another natural or legal person or due to important considerations of public interest;

- 5) the right to data portability. This is the right to receive in a structured, commonly used machine-readable format personal data provided to the Administrator by the User and the right to request the transfer of personal data to another data administrator, if technically possible. This right is granted if the following conditions are met jointly:
 - a) the processing is carried out in an automated manner,
 - b) the data is processed on the basis of consent or on the basis of a contract.

However, if the data to be transferred at the User's request is a secret of the Administrator's enterprise, then the Administrator has the right to refuse the User's request to transfer such data, of which he will be informed;

- 6) the right to object to data processing. The User has the right to object at any time - for reasons related to the User's particular situation - to the processing of data based on the Administrator's legitimate interest (i.e. pursuant to Article 6(1)(f) of the GDPR), including profiling. In such a situation, the Administrator will not be able to further process the data for these purposes, unless there are valid legally justified grounds for processing or the data is needed by the Administrator to establish, pursue or defend claims. If the User's personal data is processed for the purposes of direct marketing, the User has the right to object at any time to the processing for the purposes of such marketing, including profiling, to the extent that the processing is related to such direct marketing. Then the Administrator will not be allowed to process the User's personal data for such purposes.
2. In cases where the processing of the User's personal data is based on the user's consent (Article 6(1)(a) of the GDPR), the User has the right to withdraw this consent at any time, without affecting the lawfulness of the processing carried out on based on consent before its withdrawal.
3. Providing data by the User is voluntary, however, the consequence of not providing the necessary data will be the inability to take action consisting in contacting the Administrator with the User or aimed at concluding and providing Services with the Administrator at the User's request.
4. The processing of the User's personal data may be carried out in an automated manner, which may involve profiling. Profiling consists in creating a User profile, using computer algorithms, based on information held by the Administrator in order to identify the possible characteristics and preferences of the User. These activities will be used by the User to prepare and present the offer/marketing information best suited to the User's needs.
5. Withdrawal of consent or objection to the processing of personal data takes place by sending a message to the Administrator's e-mail address: kontakt@stretchme.pl
6. After withdrawing consent or expressing an objection, the User's personal data will no longer be processed for the purposes for which they were provided. The User may change / supplement personal data by sending an appropriate request to the Administrator's e-mail address: kontakt@stretchme.pl
7. In cases where it is recognized that the processing of the User's personal data by the Administrator violates the provisions of the GDPR, the User has the right to lodge a complaint with the supervisory body (in Poland, it is the President of the Office for Personal Data Protection).
8. Contact with the person supervising the processing of personal data in the Administrator's organization is possible by electronic means at the following e-mail address: kontakt@stretchme.pl

XII. CONTACT WITH THE ADMINISTRATOR

1. The User may at any time directly contact the Administrator by sending an appropriate message in writing or by e-mail to the Administrator's address, i.e.:
 - 1) in writing to the following address: Młocarni 69, 02-967 Warsaw

- 2) electronically to the following e-mail address: kontakt@stretchme.pl
2. The Administrator stores correspondence with the User for statistical purposes and for the best and fastest response to emerging inquiries, as well as for the purpose of settling complaints and possible decisions on administrative interventions regarding the indicated data made on the basis of reports. Addresses and data collected in this way will not be used to communicate with the User for purposes other than the implementation of the application.
3. Any User's requests for the Administrator to perform activities related to personal data will be performed by the Administrator after prior verification of the User. For this purpose, it reserves the right to ask the User again to confirm his data, including personal data, e.g. in the form of name, surname, e-mail address, etc. The above applies to the same data, including personal data, that were previously provided by the User and for the processing of which the User consented. Providing this data is not mandatory, but it may be necessary to perform activities or obtain information requested by the User.

XIII. SECURITY

1. The administrator applies appropriate technical and organizational measures to ensure the security of protection of personal data being processed, adequate to the threats and categories of personal data protected, and in particular, protects data against unauthorized access, inspection or removal by an authorized person, processing in violation of applicable regulations and change, loss, damage or destruction.
2. Taking into account the state of technical knowledge, the cost of implementation and the nature, scope, context and purposes of processing, as well as the risk of violating the rights or freedoms of natural persons with varying probability of occurrence and severity of the threat, the Administrator implements appropriate technical and organizational measures to ensure a level of security corresponding to this risk, in including but not limited to, where applicable:
 - 1) the ability to ensure the confidentiality, integrity, availability and resilience of processing systems and services at all times;
 - 2) the ability to quickly restore the availability and access to personal data in the event of a physical or technical incident;
 - 3) regular tests, measurements and assessments of the effectiveness of technical and organizational measures to ensure the security of processing.

XIV. FINAL PROVISIONS

1. In order to make the Portal even more attractive to the User, the Administrator uses "cookies". A "cookie" file is a small file containing a string of characters that is sent to the User's computer when using the Portal. The information collected automatically using "cookies" allows you to customize the services and content offered by the Administrator to the individual needs and preferences of the User, as well as to compile general statistics on the User's use of the Portal. Thanks to the cookie. The User's browser can be recognized by websites belonging to the Administrator. Most of the "cookies" used by the Administrator are deleted from the User's hard drive after the end of the session ("session cookies"). Other cookies remain on your computer

User in order to enable recognition of the User's computer during the next visit ("persistent cookies"). Disabling the option by the User that allows saving "cookies" in the web browser may make it difficult or impossible to use the Portal.

2. Bearing in mind the fact that the market of ICT network monitoring services is developing extremely dynamically, the Administrator tries to inform Users about the use of services of new entities in this respect, and the User agrees that in the future it may also be other companies. At the same time, the Administrator informs that the User may withdraw his consent in this regard at any time by changing the settings of his browser.
3. Information generated by "cookies" on the use of the Portal by the User (including his IP address) is sent, among others, to the Google Inc. server located in the USA and stored in accordance with Google's privacy policy (available at: <http://www.google.com/intl/pl/privacy/privacy-policy.html>). Google uses this information to evaluate the use of the Portal, to compile reports for website operators on website activity and to provide other related services with the use of the Portal and the Internet.
4. The detailed rules of the "cookies" policy are made public by the Administrator and can be found at <https://www.app.stretchme.app/pdfs/cookies-policy.pdf>
5. Links may be placed on the Portal (e.g. in the form of logos of third parties), which, if activated, redirect the User to an external website. The Administrator is in no way responsible for the effects of such redirects and has no influence on the content of such websites. The Administrator is not responsible for the content of the privacy and security policies in force on these websites, or for the "cookies" used when browsing them. We encourage Users using such links to familiarize themselves with the content of the relevant legal documents applicable on these websites.
6. Services and functions within the Portal may be expanded over time, which means that the Administrator reserves the right to make changes to this Privacy Policy, while maintaining the rights previously acquired by Users. The Privacy Policy applies to each User. Changes may occur e.g. for the following important reasons:
 - 1) amending applicable regulations, in particular in the field of personal data protection, telecommunications law, services provided electronically and regulating consumer rights, affecting the rights and obligations of the Administrator or the rights and obligations of Users;
 - 2) development of functionalities or Services dictated by the progress of Internet technology, including the use/implementation of new technological or technical solutions affecting the scope of the Privacy Policy.
7. The Administrator will each time place on the Portal information about changes to the Privacy Policy. With each change, a new version of the Privacy Policy will be made available to the public with a new date. Archival Privacy Policies can be found at <https://www.app.stretchme.app/pdfs/>
8. In case of doubts or conflicts between the Privacy Policy and the consents granted by the User for the processing of personal data, regardless of the provisions of the Policy

Privacy, always the basis for taking and determining the scope of activities by the Administrator are the consents or legal provisions voluntarily granted by the User.