

PRIVACY POLICY

1. The administrator of personal data obtained in particular through the platform available at www.seeplaces.com (hereinafter: the Service) and the SeePlaces mobile application (hereinafter: the Application), i.e. the entity deciding how your personal data will be used, is Akati Sp. z o.o. with its registered office at ul. Reymonta 39, 45-072 Opole (hereinafter: Administrator). Contact with the Administrator is possible via the e-mail address: info@seeplaces.com.

The Administrator is responsible for the security of the personal data transferred and their processing in accordance with the law.

- 2. The Administrator has appointed a Data Protection Officer (DPO), who can be contacted in matters related to the processing of personal data and the exercise of users' rights in accordance with the provisions on the protection of personal data via the e-mail address: info@seeplaces.com.
- 3. Personal data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the European 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 and other currently applicable (i.e. throughout the period of processing of certain data) provisions of the law on the protection of personal data.
- 4. Each time, the purpose and scope of data processed by the Administrator result from the concluded agreement, consent of the Service and/or Application user or legal provisions and are specified as a result of actions taken by the user.

I. PROVISION OF SERVICES (ELECTRONIC SERVICES)

- 1. The Administrator processes personal data for the following purposes:
 - a) Provision of a service (including a service provided electronically) aimed at providing information on travel services from suppliers and sending inquiries to suppliers for an offer (legal basis – art. 6 section 1 letter b of the RODO) – "taking action at the request of a person".
 - b) Pursuing claims arising from the contract (legal basis art. 6 section 1 letter f of the RODO) -"legitimate interest". The deadlines for pursuing claims under the agreement are specified in detail in the Civil Code.
 - c) Improvements in the quality of services provided, including customer satisfaction surveys (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
 - d) Sending marketing information by means of electronic communication (in particular e-mail, telephone calls, SMS, MMS messages), in the event of expressing a separate consent to the processing of data for this purpose (legal basis art. 6 section 1 letter a of the GDPR) "consent", taking into account the provisions of the UŚUDE and the provisions of the Telecommunications Law Act.
 - e) Direct marketing, including personalization of marketing content (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest". The Administrator may process personal data in order to prepare and present a personalized offer for a tourist event. Such data will also be processed in an automated manner, however, the decisions taken will not have legal effects on the customer.
- 2. The Administrator may also use users' personal data to make decisions based solely on automated processing of personal data, including profiling within the meaning of art. 22 of the RODO. As a result of such decisions, users may receive additional benefits in the form of, i.e. a discount on services available as part of the offer presented in the Service and in the Application.



- 3. Providing personal data to the extent that the processing of data takes place in order to conclude and perform the contract is voluntary, but necessary for the conclusion of the contract, including the implementation of a request for an offer submitted for a selected travel service offered by its provider.
- 4. Providing data in order to receive marketing communication through the selected communication channel (i.e. e-mail address, phone number) is voluntary, but necessary to receive commercial information. The consequence of not providing personal data will be the inability to receive marketing content.
- 5. The Administrator processes personal data for the purpose of sending commercial information (to an e-mail address) and for the purposes of direct marketing (using a telephone number) on the basis of separately expressed consents, in accordance with the provisions of the Telecommunications Law Act and the provisions of the act on the provision of electronic services.
- 6. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated in point 1 above. Depending on the legal basis, this will be:
 - a) the time necessary for the performance of the contract,
 - b) the time of performing legal obligations and the time during which the law requires data to be stored, e.g. tax regulations,
 - c) the time after which claims arising from the contract become time-barred,
 - d) the time until the objection is expressed,
 - e) until you withdraw your consent.
- 7. Subject to all guarantees of data security, the Administrator may transfer your personal data in addition to persons authorized by the Data Administrator to other entities, including:
 - a) entities processing data on behalf of the Administrator, e.g. hosting service providers, technical service providers and entities providing advisory services;
 - b) the travel service providers to whom Your enquiry is addressed;
 - c) other administrators to the extent necessary for the performance of services and legal requirements, e.g. electronic payment operators, contractors providing services to the Administrator on the basis of concluded contracts.
- 8. The Administrator may, to the extent necessary for the proper performance of the contract, transfer data to countries outside the European Economic Area (hereinafter: EEA) that do not provide an adequate level of protection. However, the Administrator ensures that the transfer is carried out in a safe, controlled and secured manner with appropriate agreements with their recipients, meeting the conditions set out in chapter V of the RODO. The Administrator may also transfer personal data to countries outside the EEA for which the European Commission has concluded that it ensures an adequate level of protection.
- 9. In connection with the processing of personal data by the Administrator, you are entitled to:
 - a) access your personal data,
 - b) correct your personal data,
 - c) delete personal data (the right to be forgotten),
 - d) to limit the processing of your personal data
 - e) the right to transfer data to another administrator,
 - f) the right to withdraw consent in the event that the Administrator processes the user's personal data on the basis of consent, at any time and in any way, without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal,
 - g) the right to object to the processing of data, in a situation where the basis for the processing is the legitimate interest of the Administrator,
 - h) lodge a complaint to the President of the Personal Data Protection Office, if you feel that the processing of your personal data violates the provisions of the Regulation.



- 10. In order to exercise the above rights, please contact the Administrator via the e-mail address: info@seeplaces.com.
- 11. The identification and contact details of all persons listed in the request for proposal, submitted for the selected tourist service offered by its provider, are obtained by the Administrator directly from the person who sends the request via the Service or the Application.
- 12. The person executing the inquiry referred to in section 9 above, it also does so on behalf of all persons listed in the query and thus assumes responsibility for informing them about the principles of personal data processing by the Administrator specified in this document.

II. PHONE OR E-MAIL CONTACT

- The Administrator processes personal data, in particular the contact phone number or e-mail address and other information provided by You, to the extent necessary to handle requests and fulfill the inquiry, including conducting communication and answering questions asked via the contact phone number and e-mail address provided in the Service (legal basis - art. 6 section 1 letter f of the RODO) - "legitimate interest". By providing us, as part of the communication, with information constituting specific categories of data (e.g. health information), you agree to their use for the purpose of proper handling of the request and implementation of the inquiry, including answering (legal basis - art. 9 section 2 letter a of the RODO) - "consent".
- 2. Withdrawal of consent may take place in particular by contacting the Administrator or the DPO (via the contact details indicated above). The withdrawal of consent shall not affect the lawfulness of the use of the data during the period in which the consent was in force.
- 3. Providing data is voluntary, but necessary for answering the submitted question or for the proper handling of the request and execution of the inquiry. The consequence of not providing personal data may be the inability to answer or execute the inquiry.
- 4. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated above. Depending on the legal basis, this will be:
 - a) the time necessary to complete the inquiry, including answering the question or settling the matters in connection with which correspondence or conversation is being conducted,
 - b) the time until the consent is withdrawn by the user (including the withdrawal of consent for the use of specific categories of data).
- 5. Subject to all guarantees of data security, the Administrator may transfer your personal data in addition to persons authorized by the Data Administrator to other entities, including:
 - a) entities processing data on behalf of the Administrator, e.g. hosting service providers, technical service providers and entities providing advisory services;
 - b) other administrators, to the extent necessary to answer the question asked.
- 6. The Administrator may transfer data to countries outside the European Economic Area (hereinafter: the EEA) which do not ensure an adequate level of protection. However, the Administrator ensures that the transfer is carried out in a safe, controlled and secured manner with appropriate agreements with their recipients, meeting the conditions set out in chapter V of the RODO. The Administrator may also transfer personal data to countries outside the EEA for which the European Commission has concluded that it ensures an adequate level of protection.
- 7. In connection with the processing of personal data by the Administrator, you are entitled to:
 - a) access your personal data,
 - b) correct your personal data,
 - c) delete personal data (the right to be forgotten),

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- d) to limit the processing of your personal data
- e) the right to transfer data to another administrator,
- f) the right to withdraw consent in the event that the Administrator processes the user's personal data on the basis of consent, at any time and in any way, without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal,
- g) the right to object to the processing of data, in a situation where the basis for the processing is the legitimate interest of the Administrator,
- h) lodge a complaint to the President of the Personal Data Protection Office, if you feel that the processing of your personal data violates the provisions of the Regulation.
- 8. In order to exercise the above rights, please contact the Administrator via the e-mail address: info@seeplaces.com.

III. CONTACT FORM / REGISTRATION

- The Administrator processes your personal data in order to answer questions asked via the contact form (or e-mail address and phone number) available in the Service and in the Application, including questions asked by partners and affiliates (legal basis - art. 6 section 1 letter f of the RODO) - "legitimate interest". By providing us, as part of the communication, with information constituting specific categories of data (e.g. health information), You agree to their use for the purpose of proper handling of the request and implementation of the inquiry, including answering (legal basis - art. 9 section 2 letter a of the RODO) - "consent".
- 2. Providing the data indicated in the contact form is voluntary, but necessary to answer the question asked. The consequence of not providing the required personal data is the inability to send a response to the user.
- 3. The Administrator has the right to process personal data for the period necessary to achieve the purpose indicated in point 1 above, i.e. until the user responds to the request.
- 4. Subject to all guarantees of data security, the Administrator may transfer your personal data in addition to persons authorized by the Data Administrator to other entities, including:
 - a) entities processing data on behalf of the Administrator, e.g. hosting service providers, technical service providers and entities providing advisory services;
 - b) other administrators, to the extent necessary to answer the question asked.
- 5. The Administrator may transfer data to countries outside the European Economic Area (hereinafter: the EEA) which do not ensure an adequate level of protection. However, the Administrator ensures that the transfer is carried out in a safe, controlled and secured manner with appropriate agreements with their recipients, meeting the conditions set out in chapter V of the RODO. The Administrator may also transfer personal data to countries outside the EEA for which the European Commission has concluded that it ensures an adequate level of protection.
- 6. In connection with the processing of personal data by the Administrator, you are entitled to:
 - a) access your personal data,
 - b) correct your personal data,
 - c) delete personal data (the right to be forgotten),
 - d) to limit the processing of your personal data
 - e) the right to transfer data to another administrator,
 - f) the right to withdraw consent in the event that the Administrator processes the user's personal data on the basis of consent, at any time and in any way, without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal,

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- g) the right to object to the processing of data, in a situation where the basis for the processing is the legitimate interest of the Administrator,
- h) lodge a complaint to the President of the Personal Data Protection Office, if you feel that the processing of your personal data violates the provisions of the Regulation.
- 7. In order to exercise the above rights, please contact the Administrator via the e-mail address: info@seeplaces.com.

IV. NEWSLETTER

- 1. The Administrator processes personal data in order to provide persons interested in the Administrator's offer with marketing information via a newsletter (legal basis art. 6 section 1 letter a of the RODO "consent".
- 2. The transfer of data is voluntary, but necessary to receive marketing information. The consequence of not providing the required personal data is the inability to send a response to the user.
- 3. The user using the newsletter may unsubscribe from receiving it at any time and without giving any reason, in particular by clicking on the deactivation link in any e-mail sent to the user or by sending correspondence to the following address: <u>info@seeplaces.com</u>.
- 4. The Administrator has the right to process personal data until the consent is withdrawn by the user.
- 5. The Administrator may transfer your personal data in addition to persons authorized by the Data Administrator to other entities, including:
 - a) entities processing data on behalf of the Administrator, e.g. hosting service providers, technical service providers and entities providing advisory services;
 - b) other administrators to the extent necessary for the performance of services and legal requirements, on the basis of concluded contracts.
- 6. The Administrator may, to the extent necessary for the proper performance of the contract, transfer data to countries outside the European Economic Area (hereinafter: EEA) that do not provide an adequate level of protection. However, the Administrator ensures that the transfer is carried out in a safe, controlled and secured manner with appropriate agreements with their recipients, meeting the conditions set out in chapter V of the RODO. The Administrator may also transfer personal data to countries outside the EEA for which the European Commission has concluded that it ensures an adequate level of protection.
- 7. In connection with the processing of personal data by the Administrator, you are entitled to:
 - a) access your personal data,
 - b) correct your personal data,
 - c) delete personal data (the right to be forgotten),
 - d) to limit the processing of your personal data
 - e) the right to transfer data to another administrator,
 - f) the right to withdraw consent in the event that the Administrator processes the user's personal data on the basis of consent, at any time and in any way, without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal,
 - g) the right to object to the processing of data, in a situation where the basis for the processing is the legitimate interest of the Administrator,
 - h) lodge a complaint to the President of the Personal Data Protection Office, if you feel that the processing of your personal data violates the provisions of the Regulation.



8. In order to exercise the above rights, please contact the Administrator via the e-mail address: info@seeplaces.com.

V. ADDING RATINGS AND OPINIONS ON WWW.SEEPLACES.COM

- The administrator processes personal data to enable the user to add ratings and reviews of products and services offered on the Platform (legal basis - Article 6 (1) (a) of the GDPR) -"consent".
- 2. The provision of data is voluntary, but necessary to use the service offered by the Administrator. The consequence of not providing the required personal data will be the inability to add reviews on the Administrator's products and services.
- 3. The administrator has the right to process personal data until the user withdraws his consent.
- 4. The administrator may transfer the user's personal data in addition to persons authorized by the Data Administrator to other entities, including:

a) entities processing data on behalf of the Administrator, e.g. providers of technical services and entities providing advisory services;

b) other administrators to the extent necessary to provide services and legal requirements, based on concluded contracts.

- 5. The administrator may transfer data to countries outside the European Economic Area (hereinafter: EEA), which do not ensure an adequate level of protection. The administrator, however, ensures that the transfer is carried out in a safe, controlled manner and is secured by appropriate agreements with their recipients, meeting the conditions set out in Chapter V of the GDPR. The administrator may also transfer personal data to countries outside the EEA, for which the European Commission has determined that they provide an adequate level of protection
- 6. In accordance with the processing of personal data by the Administrator, you are entitled to:
 - a) the right to access personal data,
 - b) the right to rectify personal data,
 - c) the right to delete personal data (the right to be forgotten),
 - d) the right to limit the processing of personal data,
 - e) the right to transfer data to another administrator,

f) the right to withdraw consent if the Administrator processes the user's personal data based on consent, at any time and in any way, without affecting the lawfulness of the processing which was carried out based on consent before its withdrawal,

g) the right to object to the processing of data, in a situation where the basis for processing is the legitimate interest of the Administrator,

h) the right to submit a complaint to the President of the Personal Data Protection Office, when the user considers that the processing of personal data violates the provisions of the Regulation.

7. To exercise the above-mentioned rights, please contact the Administrator via the e-mail address: info@seeplaces.com.



VI. SOCIAL MEDIA

FACEBOOK

- Akati Sp. z o.o. is the administrator of personal data of users of products and services offered by Facebook who visit the Administrator's website, available at: <u>https://www.facebook.com/SeePlacescom/</u> (hereinafter: Fanpage). The Administrator is responsible for the security of the personal data transferred and their processing in accordance with the law.
- 2. The administrator processes personal data of users who use Facebook products and services and visit Fanpage. Data is being processed
 - a) in connection with running Fanpage, including in order to promote its own brand (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
 - b) in order to answer questions asked via Messenger or other services offered by Facebook (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest"; in the case of providing by the user specific categories of data (e.g. health information), he/she declares that he/she agrees to their use for the proper handling of the request and the implementation of the inquiry, including communication and answering (legal basis art. 9 section 2 letter a of the RODO) "consent".
- 3. The Administrator has the right to process:
 - a) publicly available personal data (such as user name, profile photo, Facebook or Messenger activity status), comments and other information publicly shared by the user using Facebook products and services,
 - b) personal data provided by you to Fanpage, including the collection of information provided on your profile and other content, comments, messages and communications (e.g. photos, contact details, place of residence, information about your interests or beliefs, etc.),
 - c) other personal data provided by users in the content of messages via Messenger or other Facebook services (including contact details, health data, etc.) in order to respond to the sent inquiry or to fulfill a request to contact.
- 4. The scope of personal data processing, detailed purposes and rights and obligations of the user using Facebook products and services result directly from:
 - a) the Facebook Terms and Conditions (the document is available on the Facebook page at: https://www.facebook.com/legal/terms) and
 - b) "Data Policy" (available on Facebook at <u>https://www.facebook.com/policy</u>) or
 - c) provisions of law.
 - and are specified as a result of actions taken by the user on the Facebook social networking site.
- 5. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated above. Depending on the legal basis, this will be:
 - a) time until objection is expressed (or Facebook user account is deleted),
 - b) the time until the consent is withdrawn (or the Facebook user account is deleted). The withdrawal of consent shall not affect the lawfulness of the data processing during the period in which the consent was in force;
 - c) the period necessary to handle a query sent by a user via Messenger or other Facebook services.
- 6. The catalogue of recipients of personal data processed by the Administrator results primarily from the scope of products and services used by the Facebook user, but also from the user's consent or from legal provisions. Subject to all data security guarantees, the Administrator may transfer personal data of the user visiting Fanpage in addition to persons authorized by the Administrator to other entities, including entities processing data on behalf of the Administrator, e.g. technical

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service providers and entities providing advisory services (including legal offices) and contractors providing services to the Administrator on the basis of concluded contracts.

- 7. The Administrator will not transfer personal data of the user using Facebook products and services to countries outside the European Economic Area (to countries other than the European Union, as well as Iceland, Norway and Liechtenstein).
- 8. The Administrator may process personal data of users using Facebook productsand services who visit Fanpage, in order to analyze the manner in which users use the Administrator's website and related content (keeping statistics) if the use of Fanpage by users and related content triggers the creation of an event for the website statistics, which involves the processing of personal data (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
- 9. In the case of personal data processed for the purpose of conducting statistics on the activities undertaken by the user on Fanpage (including observing or stopping observing the page, referring the page in a post or comment, liking the page or post, cancelling the liking), the Administrator and Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint administrators of the users' personal data. The types of data and the scope of their processing, as well as the principles of privacy and user rights, are indicated in detail:
 - a) in this document,
 - b) in the "Data Policy", published on the Facebook page at: https://www.facebook.com/policy,
 - c) in the "Site Statistics Information" document, published on the Facebook page at: <u>https://www.facebook.com/legal/terms/page_controller_addendum</u>.
- 10. The responsibility for notifying users of Facebook products and services about the processing of data for the purposes of website statistics and for enabling them to exercise their rights in accordance with the RODO lies with Facebook (information about the data used to create website statistics is available on the Facebook page at:

https://www.facebook.com/legal/terms/information_about_page_insights_data.

11. The Facebook Data Protection Officer can be contacted via the form available on the Facebook page at: https://www.facebook.com/help/contact/540977946302970

INSTAGRAM

- Akati Sp. z o.o. is the administrator of the personal data of users of the products and services offered by Facebook as part of Instagram, who visit the Administrator's website, available at: <u>https://www.instagram.com/seeplacescom/</u> (hereinafter: Company Profile). The Administrator is responsible for the security of the personal data transferred and their processing in accordance with the law.
- 2. The Administrator processes personal data of users who use products and services within Instagram and visit the Company Profile. Data is being processed
 - a) in connection with the conduct of the Company Profile, including in order to promote its own brand (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
 - b) in order to answer questions asked via Instagram or other services offered by Facebook (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest"; in the case of providing by the user specific categories of data (e.g. health information), he/she declares that he/she agrees to their use for the proper handling of the request and the implementation of the inquiry, including communication and answering (legal basis art. 9 section 2 letter a of the RODO) "consent".
- 3. The Administrator has the right to process:

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- a) publicly available personal data (such as user name, profile photo, Instagram activity status), comments and other information publicly shared by the user using Instagram products and services,
- b) personal data provided by you to Company Profile, including the collection of information provided on your profile and other content, comments, messages and communications (e.g. photos, contact details, place of residence, information about your interests or beliefs, etc.),
- c) other personal data provided by users in the content of messages via Instagram or other Facebook services (including contact details, health data, etc.) in order to respond to the sent inquiry or to fulfill a request to contact.
- 4. The scope of personal data processing, detailed purposes and rights and obligations of the user using Instagram products and services result directly from:
 - a) Instagram Terms and Conditions (available on the Instagram website at <u>https://help.instagram.com/581066165581870</u> and
 - b) "Instagram Data Policy" (available on Instagram at <u>https://help.instagram.com/519522125107875</u>) or
 - c) provisions of law.

- and are specified as a result of actions taken by the user on the Instagram social networking site.

- 5. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated above. Depending on the legal basis, this will be:
 - a) time until objection is expressed (or Instagram user account is deleted),
 - b) the time until the consent is withdrawn (or the Instagram user account is deleted). The withdrawal of consent shall not affect the lawfulness of the data processing during the period in which the consent was in force;
 - c) the period necessary to handle a query sent by a user via Instagram or other Facebook services.
- 6. The catalogue of recipients of personal data processed by the Administrator results primarily from the scope of products and services used by the Instagram user, but also from the user's consent or from legal provisions. Subject to all data security guarantees, the Administrator may transfer personal data of the user visiting Company Profile in addition to persons authorized by the Administrator to other entities, including entities processing data on behalf of the Administrator, e.g. technical service providers and entities providing advisory services (including legal offices) and contractors providing services to the Administrator on the basis of concluded contracts.
- 7. The Administrator will not transfer personal data of the user using Instagram products and services to countries outside the European Economic Area (to countries other than the European Union, as well as Iceland, Norway and Liechtenstein).
- 8. The Administrator may process personal data of users using Instagram products and services who visit Company Profile, in order to analyze the manner in which users use the Administrator's website and related content (keeping statistics) if the use of Company Profile by users and related content triggers the creation of an event for the website statistics, which involves the processing of personal data (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
- 9. In the case of personal data processed for the purpose of conducting statistics on the activities undertaken by the user on Company Profile (including observing or stopping observing the page, referring the page in a post or comment, liking the profile or post, cancelling the liking), the Administrator and Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint administrators of the users' personal data. The types of data and the scope of their processing, as well as the principles of privacy and user rights, are indicated in detail:

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- a) in this document,
- b) in the "Data Policy", published on the Facebook page at: https://www.facebook.com/policy,
- c) in the "Site Statistics Information" document, published on the Facebook page at: https://www.facebook.com/legal/terms/page_controller_addendum.
- 10. The responsibility for notifying users of Instagram products and services about the processing of data for the purposes of website statistics and for enabling them to exercise their rights in accordance with the RODO lies with Facebook (information about the data used to create website statistics is available on the Facebook page at: https://www.facebook.com/legal/terms/information about page insights data.
- 11. The Facebook Data Protection Officer can be contacted via the form available on the Facebook page at: https://www.facebook.com/help/contact/540977946302970.

LINKEDIN

- 1. Akati Sp. z o.o. is the administrator of personal data of users of products and services offered by Administrator's LinkedIn, who visit the website, available at: https://www.linkedin.com/company/seeplaces/ (hereinafter: Company Website). The Administrator is responsible for the security of the personal data transferred and their processing in accordance with the law.
- 2. The Administrator processes personal data of users who use LinkedIn products and services to visit the Company Website. Data is being processed
 - a) in connection with running the Company's Website, including in order to promote its own brand (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
 - b) in order to answer questions asked through the services offered by LinkedIn (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest"; in the case of providing by the user specific categories of data (e.g. health information), he/she declares that he/she agrees to their use for the proper handling of the request and the implementation of the inquiry, including communication and answering (legal basis art. 9 section 2 letter a of the RODO) "consent".
- 3. The Administrator has the right to process:
 - a) publicly available personal data (such as user name, profile photo, LinkedIn activity status), comments and other information publicly shared by the user using LinkedIn products and services,
 - b) personal data provided by you to Company Website, including the collection of information provided on your profile and other content, comments, messages and communications (e.g. photos, contact details, place of work, place of residence, information about your education, interests or beliefs, etc.),
 - c) other personal data provided by users in the content of messages via LinkedIn services (including contact details, health data, etc.) in order to respond to the sent inquiry or to fulfill a request to contact.
- 4. The scope of personal data processing, detailed purposes and rights and obligations of the user using LinkedIn products and services result directly from:
 - a) LinkedIn Terms and Conditions (available at LinkedIn at: https://en.linkedin.com/legal/user-agreement) and
 - b) "Privacy Policy" (available at LinkedIn at: https://en.linkedin.com/legal/privacy-policy) or
 - c) provisions of law.
 - and are specified as a result of actions taken by the user on the LinkedIn social networking site.

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- 5. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated above. Depending on the legal basis, this will be:
 - a) time until objection is expressed (or LinkedIn user account is deleted),
 - b) the time until the consent is withdrawn (or the LinkedIn user account is deleted). The withdrawal of consent shall not affect the lawfulness of the data processing during the period in which the consent was in force;
 - c) the period necessary to handle the query sent by the user via LinkedIn services.
- 6. The catalogue of recipients of personal data processed by the Administrator results primarily from the scope of products and services used by the LinkedIn user, but also from the user's consent or from legal provisions. Subject to all data security guarantees, the Administrator may transfer personal data of the user visiting Company Website in addition to persons authorized by the Administrator to other entities, including entities processing data on behalf of the Administrator, e.g. technical service providers and entities providing advisory services (including legal offices) and contractors providing services to the Administrator on the basis of concluded contracts.
- 7. The Administrator will not transfer personal data of the user using LinkedIn products and services to countries outside the European Economic Area (to countries other than the European Union, as well as Iceland, Norway and Liechtenstein).
- 8. The Administrator may process personal data of users using Instagram products and services who visit Company Website, in order to analyze the manner in which users use the Administrator's website and related content (keeping statistics) if the use of Company Website by users and related content triggers the creation of an event for the website statistics, which involves the processing of personal data (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
- 9. In the case of personal data processed for the purpose of conducting statistics on the actions taken by the user on the Company Website (including following or discontinuation of following of the Company Website, recommending the Company Website in a post or comment), the Administrator and LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland) are joint administrators of the users' personal data. The types of data and the scope of their processing, as well as the principles of privacy and user rights, are indicated in detail:
 - a) in this document,
 - b) in the document "Privacy Policy", published on the LinkedIn website at: <u>https://pl.linkedin.com/legal/privacy-policy</u>,
 - c) in the 'Page Insights Joint Controller Addendum' published on LinkedIn at <u>https://legal.linkedin.com/pages-joint-controller-addendum</u>.
- 10. The responsibility for notifying users of LinkedIn products and services about the processing of data for the purposes of website statistics and for enabling them to exercise their rights in accordance with the RODO lies with LinkedIn (information about the data used to create website statistics is available on the LinkedIn website at: https://pl.linkedin.com/legal/privacy-policy).
- 11. The LinkedIn Data Protection Officer can be contacted via the form available on LinkedIn at: <u>https://www.linkedin.com/help/linkedin/ask/TSO-DPO</u>.

YOUTUBE

1. Akati Sp. z o.o. is the administrator of personal data of users of products and services offered by Google as part of YouTube who visit the Administrator's website, available at: https://www.youtube.com/channel/UCV-Q_jlzD32ESqnCQsMy5YQ (hereinafter: Company



Channel). The Administrator is responsible for the security of the personal data transferred and their processing in accordance with the law.

- 2. The Administrator processes personal data of users who use products and services within YouTube and visit the Company Channel. Data is being processed
 - a) in connection with the conduct of the Company Channel, including in order to promote its own brand (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
 - b) in order to answer questions asked via YouTube or other services offered by Google (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest"; in the case of providing by the user specific categories of data (e.g. health information), he/she declares that he/she agrees to their use for the proper handling of the request and the implementation of the inquiry, including communication and answering (legal basis art. 9 section 2 letter a of the RODO) "consent".
- 3. The Administrator has the right to process:
 - a) publicly available personal data (such as user name, profile photo, YouTube activity status), comments and other information publicly shared by the user using YouTube products and services,
 - b) personal data provided by you to Company Channel, including the collection of information provided on your profile and other content, comments, messages and communications (e.g. photos, contact details, place of residence, information about your interests or beliefs, etc.),
 - c) other personal data provided by users in the content of messages via YouTube or other Google services (including contact details, health data, etc.) in order to respond to the sent inquiry or to fulfill a request to contact.
- 4. The scope of personal data processing, detailed purposes and rights and obligations of the user using YouTube products and services result directly from:
 - a) YouTube Terms and Conditions (available on YouTube at <u>https://www.youtube.com/intl/en/about/policies/#community-guidelines</u>) and
 - b) "Privacy Policy Privacy and Terms" (available on Google at <u>https://policies.google.com/privacy</u>) or
 - c) provisions of law.

- and are specified as a result of actions taken by the user on YouTube.

- 5. The Administrator has the right to process personal data for the period necessary to achieve the purposes indicated above. Depending on the legal basis, this will be:
 - a) time until objection is expressed (or YouTube user account is deleted),
 - b) the time until the consent is withdrawn (or the YouTube user account is deleted). The withdrawal of consent shall not affect the lawfulness of the data processing during the period in which the consent was in force;
 - c) the period of time necessary to handle a query sent by a user via YouTube or other Google services.
- 6. The catalogue of recipients of personal data processed by the Administrator results primarily from the scope of products and services used by the YouTube user, but also from the user's consent or from legal provisions. Subject to all data security guarantees, the Administrator may transfer personal data of the user visiting Company Channel in addition to persons authorized by the Administrator to other entities, including entities processing data on behalf of the Administrator, e.g. technical service providers and entities providing advisory services (including legal offices) and contractors providing services to the Administrator on the basis of concluded contracts.



- 7. The Administrator will not transfer personal data of the user using YouTube products and services to countries outside the European Economic Area (to countries other than the European Union, as well as Iceland, Norway and Liechtenstein).
- 8. The Administrator may process personal data of users using YouTube products and services who visit Company Channel, in order to analyze the manner in which users use the Administrator's website and related content (keeping statistics) if the use of Company Channel by users and related content triggers the creation of an event for the website statistics, which involves the processing of personal data (legal basis art. 6 section 1 letter f of the RODO) "legitimate interest".
- 9. In the case of personal data processed for the purpose of conducting statistics on the actions taken by the user on the Company Channel (including observing or stopping observing the Company Channel, recommending the Company Channel in a post or comment, liking a video, cancelling the liking), the Administrator and Google Ireland Limited (Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin, Ireland) are separate administrators of the users' personal data. The types of data and the scope of their processing, as well as the principles of privacy and user rights, are indicated in detail:
 - a) in this document,
 - b) in the "Privacy Policy Privacy and Terms" document, published on Google's website at https://policies.google.com/privacy,
- 10. The responsibility for notifying users of YouTube products and services about the processing of data for the purposes of website statistics and for enabling them to exercise their rights in accordance with the RODO lies with Google (information about the data used to create website statistics is available on the Google website at: https://policies.google.com/privacy).
- 11. The Google Data Protection Officer can be contacted via email: <u>data-protection-office@google.com</u>.

VII. FINAL PROVISIONS

- 8. The Administrator shall secure the personal data processed by it in accordance with generally applicable provisions regarding the protection of personal data and information security.
- 9. This Privacy Policy is informative and applies in particular to the platform available at www.seeplaces.com and the SeePlaces mobile application. The Service may contain links to other websites (e.g. service providers, affiliates, suppliers and other entities cooperating with the Administrator). The administrator recommends that each user, after going to other websites, read the privacy policy applicable there.
- 10. The Administrator reserves the right to introduce changes to the applicable Privacy Policy in the case of technology development, changes to generally applicable laws, including in the field of personal data protection and in the case of the development of the Service (e.g. implementation of new functionalities).
- 11. The Administrator will notify users about relevant changes in the content of the privacy policy by posting a message on the Service website and the Application.