

PRIVACY POLICY

1. GENERAL INFORMATION

- 1.1. The purpose of this Privacy Policy ("**Policy**") is to provide information regarding the processing of Personal Data (defined below) in connection with the business activity conducted by WORKPLACE spółka z ograniczoną odpowiedzialnością sp. k. with its registered office in Warsaw.
- 1.2. Personal data is understood as information about an identified or identifiable natural person ("**Personal Data**"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, the economic, cultural or social identity of a natural person.
- 1.3. This Policy is informative. This means that it is not a source of responsibility for you.
- 1.4. We would like to inform you that we attach great importance to the security and legality of the processing of your Personal Data. Therefore, we always process your Personal Data in accordance with applicable law, in particular, but not exclusively in accordance with 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/EC ("**GDPR**"). For this reason, we undertake to exercise the utmost care to protect your Personal Data, primarily by using high-quality technical security measures to protect this data against access by third parties.

2. PERSONAL DATA ADMINISTRATOR

- 2.1. The administrator of your Personal Data is a company operating under the name WORKPLACE spółka z ograniczoną odpowiedzialnością sp. k. with its registered office in Warsaw, address: Domaniewska street 17/19 /133, 02-672 Warszawa, Poland, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Warsaw, 13th Commercial Division of the National Court Register under the number NCR 0000681015, TIN 5213783796 ("**Administrator**" or "**We**").
- 2.2. We have not appointed a Data Protection Officer. In all matters related to the processing of your Personal Data, you can contact Us as follows:
 - 2.2.1. by post to the following address: WORKPLACE spółka z ograniczoną odpowiedzialnością sp. k. with its registered office in Warsaw, address: Domaniewska street 17/19 / 133, 02-672 Warsaw, Poland;
 - 2.2.2. via email rodo@workplace.pl

3. PURPOSES OF PROCESSING YOUR PERSONAL DATA

Your Personal Data may be processed for various purposes and on various legal grounds. Below you will find the purposes and legal grounds for processing your Personal Data:

- 3.1. Using our website in the neuroinclusive.design domain ("**Website**")

Your Personal Data is processed by the Administrator:

 - 3.1.1. for the purpose of providing electronic services in the scope of sharing you the content of the Website - the legal basis for processing is the necessity of processing to perform the contract (Article 6(1)(b) of the GDPR);
 - 3.1.2. for purposes analytical and statistical - the basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in conducting analyzes of your activity, as well as their preferences in order to improve the functionalities used and the services provided;
 - 3.1.3. in order to possibly establish and pursue claims or defend against claims - the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR) consisting in the protection of our rights.

3.1.4. We receive your Personal Data for the above purpose directly from you.

3.2. Contact form, traditional correspondence, and telephone contact

Your Personal Data is processed by the Administrator:

3.2.1. in order to identify the sender and handle their inquiry sent via the provided form - the legal basis of the processing is the necessity of processing to perform the contract for the provision services (Article 6(1)(b) of the GDPR); in the scope of data provided optionally, the legal basis for processing is consent (Article 6(1)(a) of the GDPR);

3.2.2. in order to possibly establish and pursue claims or defend against claims - the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR) consisting in the protection of its rights.

3.2.1. We receive your Personal Data for the above purpose directly from you.

3.3. Legal Obligations

Your Personal Data is processed by the Administrator:

3.3.1. fulfillment of our obligations arising from legal provisions, in particular those arising from tax or accounting regulations - the legal basis for data processing is our legal obligation (Article 6(1)(c) of the GDPR);

3.3.2. in order to possibly establish and pursue claims or defend against claims - the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR) consisting in the protection of its rights.

3.3.1. We receive your Personal Data for the above purpose directly from you.

4. PERIOD OF PROCESSING PERSONAL DATA

4.1. Time of processing your Personal Data:

4.1.1. If the processing of Personal Data is based on voluntary consent, the Personal Data will be stored until the consent to the processing of Personal Data for specific, explicit, and legitimate purposes is withdrawn. Consent to the processing of Personal Data may be withdrawn at any time. Withdrawal of consent to the processing of Personal Data is made by contacting the Administrator in the manner indicated in point 2.2 above. Withdrawal of consent does not affect the lawfulness of the processing which was made based on consent before its withdrawal.

4.1.2. If the processing of Personal Data is necessary to perform the contract or to take action at your request before concluding the contract, the Personal Data will be processed for the duration of the contract, and after this period for the period of limitation of any claims resulting from applicable law.

4.1.3. If the processing is necessary to fulfill the legal obligation incumbent on the Administrator, the Personal Data will be processed for the period resulting from the applicable law.

4.1.4. If the processing is necessary for the purposes of the legitimate interests pursued by the Administrator, the Personal Data will be processed for a period not longer than it is necessary for the purposes for which the Personal Data are processed or until an objection is raised against the processing of Personal Data in the scope of processing Personal Data for these purposes, for reasons related to your particular situation, unless the Administrator demonstrates the existence of important legally justified grounds for processing override your interests, rights, and freedoms, including grounds related to the determination, investigation or defense of claims.

4.2. In each case, a longer period of processing Personal Data is decisive.

5. OBLIGATORY AND VOLUNTARY PROVISION OF PERSONAL DATA

- 5.1. If Personal Data is processed based on your consent, providing Personal Data is voluntary. Failure to provide data will result in the inability to achieve a given goal if consent is a condition for achieving this goal.
- 5.2. If personal data is processed for the purposes necessary to perform the contract you are a party to or to take action at your request, before concluding the contract, the provision of Personal Data is voluntary but necessary to conclude the contract with the Administrator.
- 5.3. If the processing of Personal Data is necessary to fulfill the legal obligation incumbent on the Administrator, then providing Personal Data is a statutory requirement.
- 5.4. If Personal Data is processed for purposes arising from legitimate interests pursued by us, the provision of Personal Data is voluntary but necessary to achieve these goals.

6. YOUR RIGHTS

- 6.1. You have the following rights related to our processing of your Personal Data:
 - 6.1.1. the right to access Personal Data - on this basis, the Administrator provides the person requesting with information about data processing, including, in particular, about the purposes and legal grounds for the processing, the scope of data held, entities to which they are disclosed and the planned date of data removal;
 - 6.1.2. the right to obtain a copy of the data - on this basis, the Administrator provides a copy of the processed data concerning the natural person submitting the request;
 - 6.1.3. the right to rectification - on this basis, the Administrator is obliged to remove any inconsistencies or errors in the processed personal data and supplement them if they are incomplete;
 - 6.1.4. the right to delete data - on this basis, you can request the deletion of data, the processing of which is no longer necessary to achieve any of the purposes for which they were collected;
 - 6.1.5. the right to limit processing - in the event of such a request, the Administrator ceases to perform operations on personal data - except operations to which you have consented - and their storage, in accordance with the adopted retention rules or until the reasons for limiting data processing cease to exist (e.g. a decision is issued supervisory authority allowing further data processing);
 - 6.1.6. the right to object to data processing - you can object to the processing of personal data at any time, without the need to justify such an objection;
 - 6.1.7. the right to transfer data - on this basis, to the extent that data is processed in an automated manner in connection with the concluded contract or consent, the Administrator issues data provided by the person to whom they relate, in a format that allows the data to be read by a computer. It is also possible to request that these data be sent to another entity, provided that there are technical possibilities in this respect both on the part of the Administrator and the indicated entity;
 - 6.1.8. the right to complain - if you consider that the processing of your personal data violates the provisions of the GDPR or other provisions regarding the protection of personal data, you can submit a complaint to the body supervising the processing of personal data, competent for the place of your habitual residence, your place of work or the place of the alleged violations. In Poland, the supervisory authority is the President of the Office for Personal Data Protection.

7. RECIPIENTS OF YOUR PERSONAL DATA

- 7.1. The expected recipients of your Personal Data are:
 - 7.1.1. other administrators who process personal data on their own behalf:
 - (a) public authorities,

- (b) entities that cooperate with us in handling accounting, accounting, tax, and legal matters - to the extent to which they become data controllers;
- 7.1.2. entities that process personal data on our behalf:
- (a) entities related to the Administrator within the meaning of art. 11a sec. 1 point 4) of the Corporate Income Tax Act, in particular, such as WORKPLACE sp. z o. o. with its registered office in Warsaw, address: ul. Domaniewska 17/19 /133, 02-672 Warsaw, Poland, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Rzeszów, XII Commercial Division of the National Court Register under KRS number 0000663562, NIP 7010672093,
 - (b) entities that support us in providing services to you,
 - (c) entities that operate ICT systems and provide IT services,
 - (d) entities that provide us with advisory, consulting, auditing, legal, tax, and accounting services,
 - (e) entities that provide document archiving services,
 - (f) our subcontractors, i.e. entities that perform a service for us or deliver goods covered by the Agreement or contracts with our clients, the implementation of which is related to the Agreement.

to the extent, it is necessary to achieve the purposes of processing your personal data.

8. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

- 8.1. As a rule, Personal Data will not be transferred outside the European Economic Area ("EEA"). However, bearing in mind the provision of services by our subcontractors in the implementation of support for ICT services and IT infrastructure, the Administrator may outsource certain activities or IT tasks to recognized subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA. In accordance with the decision of the European Commission, countries of recipients outside the EEA to which your personal data may be transferred must ensure an adequate level of personal data protection in accordance with EEA standards.
- 8.2. In connection with the above, as part of the Administrator's use of tools supporting its current activities made available, for example, by Google, your Personal Data may be transferred to a country outside the EEA, where the entity cooperating with it maintains tools for processing Personal Data with cooperation with the Administrator
- 8.3. In the case of recipients in the territory of countries not covered by the decision of the European Commission, in order to ensure an adequate level of this protection, the Administrator will conclude appropriate agreements with the recipients of Personal Data, which are based on standard contractual clauses issued by the European Commission.

9. PROFILING

- 9.1. The Administrator will not use your Personal Data for profiling.

10. COOKIES AND SIMILAR TECHNOLOGY

- 10.1. What are cookies?
- 10.1.1. Cookies are small text files installed on your device when you browse the Website.
 - 10.1.2. Cookies collect information that facilitates the use of the website - e.g. by remembering its visits and activities performed by you.
- 10.2. How we collect and use cookies:
- 10.2.1. The Administrator collects and uses the following cookies:
 - (a) Necessary cookies

- (i) The Administrator uses the necessary cookies primarily to provide you with the services and functionalities of the Website that you want to use. Necessary cookies can only be installed by the Administrator via the Website.
 - (ii) The legal basis for data processing in connection with the use of necessary cookies is the necessity of processing to perform the contract (Article 6(1)(b) of the GDPR).
- (b) Functional and analytical cookies
- (i) Functional cookies are used to remember and adapt the Website to your choices and can be installed by the Administrator and its partners via the Website.
 - (ii) Analytical cookies allow you to obtain information such as the number of visits and traffic sources on the Website. They are used to determine which pages are more and which are less popular and to understand how you move around the Website by keeping statistics on Website traffic. Data processing is carried out in order to improve the performance of the Website and can be installed by the Administrator and its partners via the Website.
 - (iii) The legal basis for the processing of Personal Data in connection with the use of necessary and analytical cookies by the Administrator, for this purpose, is its legitimate interest (Article 6(1)(f) of the GDPR) consisting in ensuring the highest quality of services provided on the Website.
 - (iv) The processing of Personal Data in connection with the use of functional and analytical cookies is subject to obtaining your consent to the use of (separately) functional and analytical cookies. This consent may be withdrawn at any time via this platform.
- (c) Advertising cookies
- (i) Advertising (Marketing) cookies allow you to match the displayed advertising content to your interests within and outside the Website. Based on the information from these cookies and your activity, you are profiled. Advertising cookies may be installed by the Administrator and its partners via our Website.
 - (ii) The legal basis for the processing of Personal Data in connection with the use of advertising cookies by the Administrator, for this purpose, is his legitimate interest (Article 6(1)(f) of the GDPR).
 - (iii) The processing of Personal Data using cookies is possible after obtaining consent, which may be withdrawn at any time

10.3. Analytical and marketing tools used by the Administrator's partners

10.3.1. Analytical and marketing tools used by the Administrator's partners. The administrator and their partners use various solutions and tools used for analytical and marketing purposes. Below is some basic information about these tools. Detailed information in this regard can be found in the privacy policy of a given partner.

- (a) Google Analytics. Google Analytics cookies are files used by Google to analyze how you use the website <https://neuroinclusive.design/> to create statistics and reports on the functioning of the website. Google does not use the collected data to identify you, nor does it combine this information to enable identification. Detailed information on the scope and principles of data collection in connection with this service can be found at the following link: <https://www.google.com/intl/pl/policies/privacy/partners>.

10.4. Cookie settings management.

10.4.1. The use of cookies to collect data through them, including access to data stored on your device, requires your consent. This consent may be withdrawn at any time.

10.4.2. Permission is not required only for cookies, the use of which is necessary to provide telecommunications services (data transmission to display content).

10.4.3. Withdrawal of consent to the use of cookies is possible through the browser settings. Detailed information on this can be found at the following links:

(a) Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

(b) Mozilla Firefox: <http://support.mozilla.org/en/kb/cookies>

(c) Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

(d) Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>

(e) Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>

You can verify the status of your current privacy settings for the browser you use at any time using the tools available at the following links: <http://www.youronlinechoices.com/pl/twojewybory> or <http://optout.aboutads.info/?c=2&lang=EN>

10.5. How long will the information collected by cookies be stored?

10.5.1. Depending primarily on the purposes and legal basis for the processing of Personal Data collected by cookies, they may be stored for a varied period.

10.5.2. The cookies collected by us will be stored until an objection is raised. The Administrator may delete Personal Data if for 3 years they will not be used for legitimate purposes (such as statistical analyses) unless the law obliges the Administrator to process personal data for a longer period.

10.5.3. Some Personal Data may be stored for longer in case you have any claims against the Administrator or in order to pursue claims by the Administrator or defend against claims (also of third parties), for the period of limitation specified by law, in particular the Polish Civil Code.

10.5.4. More information on the processing of personal data can be found above.

11. HOW DO WE SECURE YOUR DATA?

11.1. The Administrator, 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 different probability of occurrence and severity of the threat, applies appropriate technical and organizational measures to ensure the protection of Personal Data being processed appropriate to the threats and categories of data protected, and in particular protects data against disclosure to unauthorized persons, removal by an unauthorized person, processing in violation of applicable law and change, loss, damage or destruction. The disclosure of information about the technical and organizational measures used to ensure the protection of processing may weaken their effectiveness, thereby jeopardizing the proper protection of Personal Data.

12. LINKS TO OTHER WEBSITES

12.1. The website may contain links to other websites. The Administrator encourages you to read the regulations and privacy policies used for other websites. This Policy applies only to the indicated activities of the Administrator.

13. CHANGE OF POLICY

- 13.1. The Administrator may change the Policy in the future for important reasons:
 - 13.1.1. a change in the applicable law or a change in the interpretation of the above law as a result of court rulings, decisions, or recommendations of competent offices or bodies in a given scope;
 - 13.1.2. change in the method of providing services due solely to technical or technological reasons (in particular, updating the technical requirements indicated in this Policy);
 - 13.1.3. changing the scope or method of providing services to which the provisions of the Policy apply by introducing new ones, modifying or withdrawing existing functionalities or services covered by the Policy by the Administrator.
- 13.2. In the event of making changes to the Policy, the Administrator will provide the consolidated text of the Policy by publishing it on the Website and by means of a message sent to the e-mail address provided by you. The amendment to the Policy enters into force after 15 calendar days from the date of sending information about the change.

14. EFFECTIVE DATE OF THIS POLICY

- 14.1. This version of the Policy is effective from April 24, 2023.