

Privacy Policy

This document (“Privacy Policy”) aims to explain the main aspects related to personal data and cookies and their use by Unified Factory S.A. (al. Solidarności 117/309, 00-140 Warsaw, KRS: 0000322316, NIP: 1132452952, REGON: 015573000) (hereinafter “UF”) and Unified Factory LLC (501 Silverside Road PMB #313 Wilmington, Delaware 19809 US) (hereinafter “UF LLC”). UF and UF LLC together shall be called “the Unified Factory”.

The Privacy Policy specifies, in particular:

- a) types of personal data collected by the Unified Factory;
- b) how and why the Unified Factory collects personal data and for what purpose it uses them;
- c) when and why Unified Factory shares personal data with other organizations and within the group;
- d) the rights and possibilities to choose, which each person has with respect to their personal data;
- e) what cookies are used on Unified Factory's web pages and websites, and for what purposes.

Unified Factory has appointed a Data Protection Officer, who can be contacted at the following email address: security@unifiedfactory.com.

Chapter I - General information

§1. Definitions

- a) “Personal data” means information about an identified or identifiable individual;
- b) “Processing” means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
- c) “Joint controllers” (or “Operators”) mean joint administrators within the meaning of art. 26 of the Regulation, i.e. two or more administrators jointly setting goals and processing methods. Joint controllers of data are included in the scope defined in this Policy:
 - UF,
 - UF LLC;
- d) “Processor” means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- e) “Recipient” means a natural or legal person, public authority, agency or any other body to which the personal data are disclosed;

- f) “Filing system” means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
- g) “Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- h) “Pseudonymisation” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- i) “Regulation” - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing the Directive 95/46/EC (General Data Protection Regulation);
- j) “Act” - Act of 10 May 2018 on the protection of personal data.

§2. Entitlements

1. You are entitled to:

- a) request Unified Factory to provide access to your Personal Data, correct it, delete or limit the processing,
- b) object to the Processing,
- c) transfer Personal Data (receive from Unified Factory Personal Data in a structured, commonly used machine-readable format),
- d) submit a complaint to the supervisory body - the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw.

2. If your Personal Data is processed by Unified Factory for direct marketing purposes, you are entitled to object to the processing of your Personal Data for such marketing purposes.

3. In order to use the rights referred to in this paragraph, please send Unified Factory a request to the email address of the Data Protection Officer: security@unifiedfactory.com.

§3. The rules of personal data protection

1. Taking into account the state of the art, the costs of implementation

and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity, Unified Factory has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of Personal Data;
- (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident;
- (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

2. In assessing the appropriate level of security Unified Factory has taken into account in particular the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

3. Your Personal Data may only be processed by persons authorized by Unified Factory, trained in protection of Personal Data and obliged to maintain confidentiality of your personal data.

Chapter II - detailed provisions regarding persons using the Unified Factory website

§1. Introduction

When you visit Unified Factory websites, you can provide us with your Personal Data, for example by subscribing to the newsletter, writing an email to us, contacting us on the chat or calling through a built-in application. Unified Factory will only process the Personal Data which are demonstrably transferred to Unified Factory. The provisions of Chapter I, Chapter IV and Chapter V also apply to this chapter.

§2. Legal basis, purposes and period of personal data processing

1. The legal basis for the processing of your Personal Data will be:

- a) article 6 section 1 letter a) of the Regulation, i.e. Personal Data will be processed for the purposes of receiving commercial information by email address and/or telephone contact for the purposes of direct marketing of Unified Factory products and services.
- b) article 6 section 1 letter c) of the Regulation, i.e. Personal Data will be processed for the purposes of proper fulfilment of legal obligations of Unified Factory, including for the purposes of responding to contact from you;
- c) article 6 section 1 letter f) of the Regulation, i.e. Personal Data will be processed for the purposes of direct marketing of Unified Factory services and within the legitimate interest of Unified Factory.

2. Personal data will be processed for a period of 6 years from the date of transfer of your Personal Data to Unified Factory.

§3. Scope of processed data

1. Unified Factory will only process Personal Data transferred by you. In case of the newsletter, these will be: a name and an email address. If you contact Unified Factory, the scope of transferred Personal Data will depend on specificity of the situation (e.g. for the purposes of receiving an offer you may provide Unified Factory with your company details and contact details, including a full name, an email address and a telephone number). Unified Factory will only ask for the personal data which are necessary to meet your expectations.

2. Your personal data will not be subject to profiling.

Chapter III - detailed provisions regarding UF Easy

§1. Introduction

This chapter defines in detail issues related to the processing of Users' Personal Data by the Joint controllers on the Platform. Any expressions written in this chapter with a capital letter will have the meaning given to them in the Regulations, which can be found at: <https://unifiedfactory.com/terms/>. The provisions of Chapter I, Chapter IV and Chapter V also apply to this chapter.

The Joint controllers have jointly determined that the entity responsible for fulfilment of the obligations under the Regulation with respect to the Users and persons whose data are processed is UF.

§2. Legal basis, purposes and period of personal data processing

1. The legal basis of the Processing of the User's Personal Data is:

a) article 6 section 1 letter b) of the Regulation, i.e. Personal Data will be processed for the purposes of execution of the contract concluded between the Joint controllers and the User;

b) article 6 section 1 letter c) of the Regulation, i.e. Personal Data will be processed for the purposes of proper fulfilment of legal obligations of the Joint controllers;

c) article 6 section 1 letter f) of the Regulation, i.e. Personal Data will be processed for the purpose of direct marketing of Joint controllers' services and using the legitimate interest of Joint controllers, which in this case is understood as the ability to establish, exercise or defend against Users' legal claims. The Data will be processed for a period of six years from the end of the calendar year in which the contract between the Joint controllers and the User has been terminated.

§3. Scope of processed Users' data

1. In order to execute the contract on Service provision, the Joint controllers will process the Personal Data transferred by the User in the following scope: a full name, an email address, a telephone number.

§4. Data recipient categories

1. The Data set is stored on servers ensuring their proper protection, belonging to companies providing hosting services, based on contracts concluded with these companies by the Joint controllers. Full access to the Data set is only provided to the collaborators of the Joint controllers who have been authorized in writing to process Personal Data.

2. The Joint controllers reserve the right to transfer or share information about the User with other service providers in order to ensure better functioning of the Platform, including the necessary software, storage, other technology and services intended for using and operating the Platform. It may require transfer of information from the current location of the User to the Platform servers and other authorized service providers.

3. Service providers are entitled to Process User's Personal Data only to the extent necessary to ensure the Services provided by the Platform.

4. The Operators enable payments for individual services using intermediaries. If the User makes payments to the Operators or in order to purchase individual products or services, the Operators may transfer information which identifies the User personally to such an intermediary in order to allow such payment, including, but not limiting to, User's full name, address and information regarding credit card.

5. The operators enable use of telecommunications services through intermediaries. If the user uses telecommunications services, the Operators may transfer information that identifies the User personally to such an intermediary in order to enable the use of the service on the Platform.

6. The operators enable the use of communicator services in form of Facebook Messenger on their Platform. If the user uses this service, the Operators may transfer information that identifies the User personally to the owner of the communicator in order to enable the use of the service on the Platform.

7. In order to continuously improve the Platform operation and its functionality, the Operators receive support of third parties. These are entities which provide analytical, remarketing, marketing and emailing services. The Operators share Users' data with the aforementioned categories of recipients on the basis of relevant agreements on entrustment of personal data processing, signed with them to secure proper protection of Users' personal data.

8. The use of the Platform involves transfer of the User's Personal Data to third countries, due to the fact that one of the Joint controllers has its registered office in the United States of America. The Joint controllers ensure appropriate security in the scope of protection of privacy, rights and freedoms of Users through signed standard contractual clauses of personal data protection, approved by the European Commission.

§5. Data collected for and by the User

1. If the User uses the Platform, they may import Personal Data of natural persons cooperating with the User or employed by the User onto the Platform.
2. At the request of the User who administers such Data, the Operators become their processors.
3. Acting as a Processor, the Operators have no direct connection with a person other than the User and, therefore, the User is obliged to ensure that they have an appropriate authorization for the Operators to collect and process such Data.
4. In accordance with the rules of the Personal Data Processing, the Operators may transfer User's Personal Data to companies which help Operators in promoting, supplying and supporting the Platform.
5. Operators may use and incorporate information transferred and collected by the User into system components.
6. Acting as a Processor, the Operators will keep processed Personal Data on behalf of the Users as long as they provide services to a specific User on the basis of the concluded contract.
7. Operators may profile collected information about Users.

Chapter IV - Cookies

1. Unified Factory declares that the websites and the Platform use “cookies”.
2. Cookies are information which is sent by the Unified Factory websites and the Platform server and saved on your device (e.g. a hard drive of a computer or telephone). More information about cookies may be read at www.wszystkooociasteczkach.pl.
3. The Data obtained through cookies do not allow for identification of you or third parties, but enable Unified Factory to determine whether the Unified Factory websites or the Platform was visited from a particular computer (which is not synonymous with information on who the visitors are) and what actions have been made on them (clicks, interests, etc.).
4. Unified Factory uses internal cookies for the following purposes:
 - a) in order to ensure proper functioning of the Unified Factory websites and the Platform,
 - b) for statistical purposes,
 - c) in order to adapt the Unified Factory websites and the Platform to selected preferences.
5. Unified Factory may place both permanent and temporary cookies on your and third parties' devices.
6. Temporary cookies are usually removed when the browser is closed, but as far as persistent cookies are concerned, closing the browser does not delete them.
7. Temporary cookies are used to identify the User as logged-in to the Platform.
8. Persistent cookies are files that ensure certain functions not only in the course of a given session, but throughout the period of their storage on a computer. Persistent cookies are used for: collecting information on the use of the Unified Factory websites and the Platform, including data on visited

subsites and possible errors, checking effectiveness of advertisements, improving the websites of Unified Factory and the Platform by recording occurring errors, testing various variants of stylistics of Unified Factory and Platform websites, memorizing preferences settings, showing Users that they are logged in to the Platform.

9. The Unified Factory websites and the Platform use Google Analytics, which uses cookies on your and third parties' devices to produce statistics on volume of traffic on the Unified Factory websites and the Platform and a method of using them.

10. At any time, you may delete cookies left by the Unified Factory websites and the Platform from your device in accordance with the instructions of the browser manufacturer.

11. You may also block the access of cookies to your device by configuring the browser; however, the Unified Factory and Platform websites may not function properly.

12. In order to analyse the operation of the information system, Unified Factory uses a server which automatically stores in the server log files information about the device which you use when connecting to the Unified Factory websites and the Platform, i.e. information about the type of used device and browser, computer IP, date and time of entry, text description of the event and event qualification.

13. The log files may be accessed only by persons authorized to administer the information system.

14. The log files may be used to produce statistics related to traffic assessment on the Unified Factory websites and the Platform, as well as error occurrence.

15. Unified Factory will use the following analytical/statistical data for statistical purposes: a number, frequency and effectiveness, in a way preventing your identification and will be entitled to publish the statistics, in particular during conferences, industry meetings and in trade press.

Chapter V - Changes to the Privacy Policy

1. The policy may change, which will be communicated by Unified Factory. If, as a User, you would like to discontinue using the Services, you may do so within 14 days from the date of receipt of the information on changing the Policy. By continuing to use our Services after changing the Policy, you will agree to the change.

2. In the event of resignation from the Services, the provisions contained in the Regulations apply.

3. The Policy comes into force on 03.09.2018.

4. The current version of the Policy is available for download also in a PDF format.