

Privacy Policy

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PRIVACY POLICY

Updated: March 1, 2020

[Definitions] For the purposes of this Privacy Policy, all terms written with capital letters, such as e.g. Agreement, Service etc. shall have meanings given to them in the Terms and Conditions available [here](#) (Chapter: Definitions), unless the Privacy Policy defines them otherwise below:

Data: Personal data in relation to which an informational obligation is being fulfilled by continuously providing information included in this Privacy Policy.

You: You, i.e. a natural person whose Data are being processed by us as the Controller (as defined in GDPR), in relation to your use of the Service.

We or Controller: an entity providing the Service to the Users: GGPREDICT SP.Z O.O. a limited liability company with its registered office in Warsaw, PL at Jugoslowianska 17a Street, entered to the register of entrepreneurs of the National Court Register under the number 0000810173, register files of which are kept by the District Court for Warsaw in Warsaw, 12 Commercial Division of the National COURT Register, NIP (*tax identity number*) 1133005669, REGON (*statistical number*): 384701481, with share capital amounting to PLN 7,800.00.

GDPR: Regulation 2016/679 of the European Parliament and the European Council from April 27, 2016 on the protection of individuals with regard to the processing of personal data and free movement of such data, as well as repealing Directive 95/46/WE (general regulation on data protection);

[Data] We can obtain your Data directly from You. Especially, but not always, these Data may include: User ID, email, information provided while using the Service, including information collected by cookies; information necessary for tax and accounting purposes, as defined by the binding provisions of law (if applicable); other data which you decide to provide us with.

[Purpose of Data processing]**[Legal grounds of Data processing]**

Execution of Agreements on provisions of the Service

Article 6 point 1 letter b of GDPR (processing for the purpose of performance of a contract)

Statistical measurements

Article 6 point 1 letter b of GDPR (processing for the purpose of performance of a contract) or, if such measurements are not necessary for the purpose of agreement performance - Article 6 point 1 letter f of GDPR (legitimate interests pursued by the Controller)

Own marketing

Article 6 point 1 letter f of GDPR (legitimate interests pursued by the Controller)

Newsletters

Article 6 point 1 letter f of GDPR (legitimate interests pursued by the Controller)

Maintaining business relationships and informing former and current clients about new services

Article 6 point 1 letter f of GDPR (legitimate interests pursued by the Controller)

Tax, accounting and other purposes resulting from Controller's legal obligations

Article 6 point 1 letter c of GDPR (processing necessary to fulfill legal obligations of the Controller)

[Retention period]: We only process the Data for as long as it is necessary. When the purpose of the Data processing has been fulfilled, the Data will be deleted in accordance with our data retention policy, unless we are legally obliged to keep such Data. Depending on the legal grounds of processing, the Data may be processed for the following periods of time: if they are processed based of a ground of necessity to execute the Agreement - for the term of the Agreement and until expiry of claim limitation period related thereto; if they are processed based on a ground of a legitimate interest of the Controller - until a successful objection is



filed; if they are processed based on a ground of fulfilling a legal obligation of the Controller - in the scope and for a period necessary to fulfil such obligations in compliance with the law; if they are processed based on a consent - until withdrawal thereof.

[Data recipients] The recipients of the giving Data categories may be the authorities entitled to receive Data in compliance with binding provisions of law. Moreover, Data may be received by Our service providers such as e.g. IT or accounting services. For the moment, we do not plan to transfer the Data to third countries (i.e. the countries outside the EEA (European Economic Area)). Should it, however, happen, it will be executed in compliance with all requirements resulting from the binding provisions of law.

[Your rights] Depending on a situation, you are granted several rights based on GDPR. Those include among others: (a) right to access your Data, including receiving a copy thereof; (b) right of rectification of your Data; (c) right of erasure of your Data (only in cases foreseen by GDPR); (d) right to restrict processing of your Data; (e) right to withdraw your consent - to the extent in which your Data are processed based on your consent. Remember that withdrawal of your consent does not impact lawfulness of processing before such withdrawal; (f) right to Data portability; (g) right to object against processing of your Data; (h) right to file a complaint to the supervising authority - the President of the Personal Data Protection Office ([current contact data are available here](#)).

[Updating information] As the privacy policy is an up-to-date information about the processing of Data, its content may change so that it is consistent with the actual processing of your Data. The current privacy policy together with information about the date of the last update will always be available in the Service.

[Contact] In case you have any doubts regarding the processing of your Data, please contact us by sending an email to: privacy@ggpredict.io.

[General information about cookies] Cookies are IT data, in particular text files, which are stored in the end device of website and application users. Cookies usually contain the domain name of the website from which they originate, their storage time on the end device and a unique number. The website / application may place a cookie in the browser if the browser allows it. Importantly, the browser allows the website / application to access only those cookies which were placed by this website / application, and not the files placed by any other websites / applications.

[Types of cookies] In scope of the Service, cookies are placed by Us and - potentially - by third parties. Depending on cookies and other technologies lifetime, We use two main types of these files: (a) session cookies - temporary files stored on the end device until logging out, leaving the website and application or turning off the software (web browser); (b) persistent

- stored on the User's end device for the time specified in the cookie file parameters or until they are deleted by the User. Depending on the purpose of cookies and similar technologies, the following types may be used: (a) necessary for the operation of online services - enabling the use of these services, e.g. authentication cookies files; (b) to ensure safety; (c) performance cookies - enabling the collection of information on how to use online services; (d) functional - enabling "remembering" selected settings and interface personalisation, e.g. in scope of chosen language or region that you are from; (e) advertising - enabling delivery of advertising content tailored to your interests; (f) statistical - used to count statistics regarding websites and applications.

[How we can use cookies] We may use cookies and similar technologies to: (a) provide online services; (b) adjust those services to User's preferences and optimize them; e.g. cookies files allow in particular for recognizing device that uses the online service and display website in the adjusted version to its individual needs; (c) create statistics that enable us to understand how the Users are using our online services, which allows us to improve their structure and content; (d) maintaining User's session (after logging in), thanks to which User does not have to re-enter the login and password on each subpage; (e) advertising presentations, including in a way that takes into account the User's interests.

[Browser settings] In many cases, the software used for browsing websites (web browser) allows by default to store information in the form of cookies and other similar technologies on Your end device. You may, however, at any time change those settings. Failure to make such changes, means that the above information may be placed and kept in Your end device and therefore, We will be able to store information on Your end device and we will have access to this information. From the level of web browser You use, it is possible to e.g. independently manage cookies. The most popular browsers include option of: accepting cookies, which allows You to take full advantage of the options offered by the websites; management of cookies at the level of individual sites selected by You; specifying settings for different types of cookies, for example accepting persistent cookies as session cookies etc.; blocking or deleting cookies. Comprehensive information on this subject is available in software (web browser) settings. Please note that limitations or exclusions of the use of cookies and other similar technologies may affect some of the functionalities available in our online services.