Privacy policy

What can you find in this document?

Information about protecting your personal data, including your rights.

We have divided the Policy into three sections:

- 1. an explanation of the terms used in the Policy, information about our contact details and your rights;
- 2. detailed information about the processing of your personal data; we have provided information separately for each form you can fill in on our Website,
- 3. information about cookies.

Part I – General provisions

§ 1

The Controller

- 1. We, Property Group sp. z o.o. with its registered office in Warsaw are the controller of your personal data. In the further part of the Privacy Policy we refer to ourselves in the first person or as "Controller" or "We".
- Our registration records are maintained by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register, under the KRS numer: 335123, tax identification number (NIP) 512-353-80-80. Our share capital is PLN 50,000. In our records you can find the most important information about us, e.g. financial statements or our articles of association.
- 3. you can contact us:
 - a. by post: Adama Naruszewicza 27 st. locale 101, 02-627 Warszawa,
 - b. by e-mail at: biuro@rynekpierwotny.pl,
 - c. by phone at: +48 (22) 825 60 71.

§ 2

Terms used in the Privacy Policy

If you notice any of the following capitalized terms in the remainder of our Privacy Policy, you should understand them as defined below:

- a. "Website" the website, the main page of which is located at https://bigdata.rynekpierwotny.pl,
- b. "Policy" means this document, the privacy policy you are reading,
- c. "GDPR" 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 Directive 95/46/EC. The text of the GDPR can be found here.

§ 3

The protection of personal data

- 1. As a Controller we process all personal data that you provide on the Website or that we collect about you when you use the Website, in accordance with the GDPR.
- 2. We use technical measures required by current data protection legislation to prevent unauthorised persons from obtaining and modifying personal data sent electronically, namely within our Website.

Your rights regarding your personal data

- 1. We process your personal data therefore:
 - a. you have the right to access your personal data,
 - b. you can make corrections to your personal data,
 - c. you can request the erasure of your personal data where allowed by the GDPR,
 - d. you have the right to limit processing, to the extent specified in the GDPR.
- 2. In Parts II and III of the Policy, you will find information about additional rights. In certain situations, you will have additional options.
- 3. Want to exercise your rights or learn more about your rights? Please contact us. Our contact details can be found in § 1.3 of the Policy.

§ 5

Right to object

- 1. After you have provided us with your personal data or if we have collected it ourselves, you can exercise your right to object. You have this right in two situations where we process your personal data:
 - a. for direct marketing purposes; you do not have to justify such an objection;
 - b. on the basis of our other legitimate interests; such an objection needs to be justified by your particular situation. Write us why we should not process your data.
- 2. You want to exercise your right to object? Please contact us. You will find our contact details in § 1.3 of the Policy.

§ 6

Complaint to the President of the Office for Personal Data Protection

If you think that we process your personal data unlawfully, you can file a complaint to the supervisory authority. In Poland it is the President of the Office of Personal Data Protection. <u>Here is the link to the President's website</u>.

δ 7

Questions regarding the Policy and where it is published

- 1. If you have any questions regarding the Policy let us know.
- 2. The Policy can be found at www.rynekpierwotny.pl and at our registered office.

Part II – information relating to the processing of your personal data in the various forms and when contacting us

§ 8

Contacting us via contact form, e-mail or telephone

If you use these options on our Website, please note the following:

- a. Why do we need your data, i.e. for what purpose do we process it?
 - o to respond to your message and resolve the matter you have submitted,
 - o at your request, to take steps aimed at presenting you with a proposal to conclude an agreement for the creation of an account on the Website.
- b. What are your rights?We have descibed them in § 4 and 5 of the Policy.
- c. Do you have to give us your data?

It is voluntary. Without providing your contact information, we may not be able to resolve the matter you have presented to us, nor will we be able to make you an offer to enter into an agreement to create an account on the Website.

d. On what legal basis do we process your data?

Article 6(1)(b) and (f) of the GDPR, i.e. taking action by us before concluding an agreement with you for the creation of an account on the Website and our legitimate interest.

e. What is our legitimate interest?

Responding to your message and resolving the case presented by you.

f. Who will be given your data?Entities hosting (storing) the Website and/or personal data for us.

g. How long will we process your data?

For the period of time:

- needed to resolve the case presented by you. Depending on the type of issue, also for the time needed to demonstrate that we have resolved it, i.e. the period of the statute of limitations for claims.
- needed to prepare a proposal for you to enter into an agreement with us for the creation of an account on the Website and to conduct discussions regarding this proposal.
- h. Will we transfer your personal information outside the European Economic Area? No.

8 9

Filling in the form (e.g. for the so-called landing page) with a request for contacting you on the offer

If you use the possibilities on our Website, pay attention to the following matters:

- a. Why do you provide us with your data, i.e. to what purpose do we process them?

 To undertake actions at your request to present you with an offer to conclude an agreement for setting up an account on the Website.
- b. What rights do you have?We have described them in § 4 and 5 of the Policy.
- c. Do you have to provide us with your data?
 This is voluntary. Without providing your contact details, we will not be able to present you with an offer to conclude an agreement for creating an account on the Website.
- d. On what legal basis do we process your data?

 Article 6(1)(b) of the GDPR, i.e. undertaking actions before concluding an agreement with you to create an account on the Website.
- e. What is our legitimate interest?

 Answering your message and solving your case.
- f. Who will we transfer your data to?

 To entities dealing with hosting (storage) of the Website or personal data for us.

- g. How long will we process your data?
 For the time needed to prepare an offer for you to enter into an agreement with us to create an account on the Website and to discuss the offer.
- h. Will your personal data be transferred outside the European Economic Area? No.

§ 10

Creating an account on the Website

If you use these features on our Website please note the following:

- a. Why do we need your data, i.e. for what purpose do we process it?
 - o to perform the agreement to create an account on the Website,
 - o to verify your right to represent the person you are representing (e.g. as a member of the board or an agent) in the agreement for creating an account in the Website,
 - in the context of creating an account on the Website, you also have the opportunity to subscribe to our newsletter. Information on the processing of personal data in this regard has been provided in § 10 of the Policy.
- b. What are your rights?

We have described them in § 4 and 5 of the Policy. You may also exercise your right to transfer your personal data under the terms of the GDPR.

- c. Do you have to provide us with your data?It is voluntary. However, without providing it you cannot create an account on the Website.
- d. On what legal basis do we process your data?

 Article 6(1)(b) and (f) of the GDPR, i.e. performance of the agreement we conclude with you and our legitimate interest.
- e. What is our legitimate interest?

Verification of your entitlement to represent the entity with which we enter into an agreement to create an account on the Website.

f. Who will be given your data?

Entities hosting (storing) the Website and/or personal data for us;

- g. How long will we process your data?
 - For the duration of the agreement to create an account on the Website and the time necessary to prove that we performed it correctly. This time period corresponds to the length of the statute of limitations for claims.
- h. Will we transfer your personal information outside the European Economic Area? No.

§ 11

Newsletter

You can sign up for a newsletter on our Website. If you do so, please note the following:

a. Why do we need your data, i.e. for what purpose do we process it?

Sending you marketing communication by e-mail, analysing whether you read our newsletters and which content you read most often. We may also tailor the content of the newsletter to your interests on this basis.

b. What are your rights?

We have described them in § 4 and 5 of the Policy. You may also exercise your right to transfer your personal data under the terms of the GDPR.

c. Do you have to provide us with your data?

It is voluntary. However, without providing it you cannot subscribe to our newsletter and receive commercial information from us.

d. On what legal basis do we process your data?

- 1) Article 6(1)(f) of the GDPR, that is our legitimate interest.
- 2) Article 10 of the <u>Act on Providing Electronic Services</u> and Article 172 of the <u>Telecommunications Law</u>. Remember that you can always revoke your consent. If you wish to do so, please contact us or click on the link in the newsletter to unsubscribe from our database.

e. What is our legitimate interest?

Improving our newsletter by analysing whether you read the content and which news items you are most interested in, and tailoring the content of our newsletter to your interests.

f. Who will be given your data?

Providers of newsletter mailing tools,

g. How long will we process your data?

For the duration of our marketing activities or until you object to further processing for marketing purposes, or revoke your consent to sending messages to your email address. Revocation of consent by you does not affect the lawfulness of processing prior to withdrawal of consent.

h. Will we transfer your personal information outside the European Economic Area? No.

Part III - information about cookies

§ 12

What are cookies and why do we use them

- 1. On the Website we use cookies, which is a small text information stored on your terminal device (e.g. computer, tablet, smartphone). Cookies can be read by the Website. Want to know more about cookies? Check out this <u>link</u> on Wikipedia
- 2. We store cookies on your computer, phone or tablet and access the information they contain for the following purposes:
 - a. for marketing purposes, involving the collection of information about your activities on the Website; this enables us to tailor its content to your interests and needs, for example by generating personalised content for you; we also tailor advertisements displayed to you on other websites to what you have viewed on our Website,
 - b. to operate the counters of visits,
 - c. or statistical purposes, in particular to enable us to analyze the way you use the Website, to create general statistics regarding the use of the Website,
 - d. maintaining your session on the Website, including after you have logged in,

- e. marketing in the form of sending you web push messages, if you have consented to this on the Website through your browser.
- 3. Processing of your personal data may take place in the cases described in section 2 above:
 - a. its processing we carry out on the following grounds:
 - for the purposes described in letters a-d above, the basis is our legitimate interest, i.e. Article 6(1)(f) of the GDPR;
 - in relation to the purpose described in point e above, the legal basis is your consent given pursuant to Article 10 of the <u>Act on Providing Electronic Services</u> and Article 172 of the <u>Telecommunications Law</u>; remember that you can revoke this consent at any time;
 - b. our legitimate interests are to conduct marketing of our Website by matching online advertisements displayed to you based on your prior activities on the Website, to collect statistical data about your use of our Website to optimize its performance, and to maintain your session on the Website so that you can use our services;
 - c. your rights related to this processing are outlined in § 4 and 5 of the Policy;
 - d. remember that you can contact us at any time and object to the processing of your personal data that we process on the basis of our legitimate interests. This includes those for marketing purposes. You do not need to justify an objection to processing for marketing purposes;
 - e. We will transfer your personal data to advertising network operators, including social networks and the entities indicated in § 15 of the Policy;
 - f. we will retain your personal data for the duration of these marketing or statistical and analytical activities or until you object to further processing for marketing purposes, or object in relation to statistical or analytical purposes, or revoke your consent to receive web push messages;
 - g. we will not transfer your data outside the European Economic Area;
 - h. the provision of this personal data is voluntary, and there are no negative consequences for not providing it, e.g. by using appropriate blocking software.

§ 13 Types of cookies

There are several types of cookies on the Website:

- a. session cookies, which remain in the memory of your web browser until you turn it off,
- b. permanent, which remain in the memory of your web browser until you delete them,
- c. external, they come from the providers of tools for analytics in our service and from the owners of social networking sites, who support the possibility of logging into our website using the accounts on social networking sites.

§ 14

How to delete cookies

- 1. You can configure your web browser to prevent cookies from being stored on your computer, phone or tablet.
- 2. You can delete cookies once they have been stored by us. To do this, you can use: the relevant functions of your browser, programs for this purpose or the relevant tools available within your operating system.
- 3. You can find information on how to delete cookies in the most popular web browsers by checking these links:
 - Firefox: https://support.mozilla.org/en-US/kb/clear-cookies-and-site- data-firefox,
 - Opera: https://www.opera.com/pl/use-cases/clean-browser-and- remove-trackers,

- Edge: https://support.microsoft.com/en-us/microsoft-edge/delete- cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9- 2a946a29ae09,
- Internet Explorer: https://support.microsoft.com/en-us/windows/delete-and-manage- cookies-168dab11-0753-043d-7c16-ede5947fc64d,
- Chrome: https://support.google.com/accounts/answer/32050? hl=en&co=GENIE.Platform%3DDesktop,
- Safari: https://support.apple.com/pl-pl/guide/safari/sfri11471/mac

§ 15

Effect of changing your browser settings on the use of the Website

Changing the configuration of your web browser to a setting that disables or restricts the storage of cookies may result in restrictions to the functionality of the Website. Deleting cookies during the provision of the service may lead to similar effects. This means that some of our services will not be available without cookies, for example you will not be able to log into the Website.

§ 16

External cookies

- 1. The cookies stored on your computer, phone or tablet may come from other service providers. You can delete them yourself from your device. How to do this is indicated in § 13. These files are stored on your device for varying lengths of time, depending on the file in question.
- 2. We use the following services:

Google Analytics, provided by Google Ireland Limited). These services help us analyze traffic on the Website. On their basis we obtain statistics that show how you and other users use the Website. You can block Google Analytics from working. For this purpose, install this browser add-on provided by Google Inc. available here: https://tools.google.com/dlpage/gaoptout?hl=en