PRIVACY

I. General information

The administrator of personal data (and in the case of data entrusted by users – a processor) processed by the website:

· www.bemirplus.com

be heard in connection with the provision of accounting services is Bemir Plus spółka z ograniczoną odpowiedzialnością with its registered office in Poznań, with its registered office in Poznań, with the address Górecka 104, Poznań 61-483, entered into the Register of Entrepreneurs of the National District Register Poznań-Nowe Miasto and Wilda in Poznań, VIII Commercial Division of the National Court Register under number 0000605695, having NIP: 7792440409 (hereinafter referred to as – respectively – the Website, Service and BEMIR PLUS).

BEMIR PLUS processes personal data:

- 1. provided by users of the website;
- 2. provided by users in connection with the use of the Service in order to properly provide the Service.
- 3. In addition, BEMIR PLUS processes a number of data in the form of so-called BEMIR PLUS files – in order to adjust the content of the Website, optimize the use of the above-mentioned, prepare analyzes, research and – after their prior anonymization – statistics, as well as to ensure the reliability and security of the Website. More information on the specifics of cookies and the scope of use of the information obtained in this way is described in detail in the further part of this privacy policy. At the same time, BEMIR PLUS reserves that due to the scope of collected cookies and the possibility of their use by BEMIR PLUS, they do not constitute personal data. BEMIR PLUS processes personal data on the basis of the consent expressed by the data subject (i.e. pursuant to Article 6(1)(a) of 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 (hereinafter referred to as GDPR). At the same time, it is stipulated that BEMIR PLUS is also entitled to process data in order to protect its legitimate interests in a situation where the interests or fundamental rights and freedoms of the data subject do not prevail over the above-mentioned interests, i.e. on the basis of Article 6(1)(f) of the GDPR. The personal data referred to above, BEMIR PLUS will be processed for the period of use by the data subject of the Website and / or the Service until the above-mentioned person receives a request from the above-mentioned person to delete the collected personal data.

II. Cookies

In order to improve the use of the Website, in particular by adapting them to the individual needs of people using them, BEMIR PLUS uses the so-called cookies, i.e. short text-numerical information saved on the device through which a given person browses the Websites. These files then enable the subsequent identification of such a device and, consequently, the person using it, in the event of subsequent visits to the Website. However, it is possible to independently block or limit the access of cookies to the above-

mentioned device and permanently delete files already saved. For this purpose, it is necessary to make appropriate modifications to the settings of the web browser used in the above-mentioned device. At the same time, BEMIR PLUS declares that blocking or limiting the access of cookies to the device may adversely affect the functionality of the Website and ensures that saving cookies on the device does not cause any configuration changes both in the device and in its software.

BEMIR PLUS cookies are used for the following purposes:

- 1. adjusting the content of the Website to the preferences of people using them and optimizing the use of them.
- 2. recognizing the device and its location and properly displaying the Website tailored to individual needs.
- 3. optimization of the use of the Website by the user in particular, these files allow to recognize the basic parameters of the user's device and properly display the Website, tailored to his individual needs.
- 4. analysis and research and audience audit by creating anonymous statistics that help to understand how the Website is used, which allows improving their structure and content.
- 5. ensure the security and reliability of the Website.

Third-party cookies are used for the following purposes:

- 1. collect general and anonymous static data through analytical tools, e.g. Google Analytics.
- presenting advertisements tailored to the user's preferences using an online advertising tool, e.g. Google AdWords.
- 3. use interactive features to popularize the Website through social networking sites, m.in such as Facebook.com.

III. Method of processing personal data.

BEMIR PLUS undertakes to process all personal data entrusted to it using the adopted principles, guidelines and technical measures aimed at ensuring the security of the above-mentioned data. All persons authorized by BEMIR PLUS to access the processed personal data are obliged to comply with the above regulations, as well as to maintain in absolute confidentiality both the content of the processed data and information on measures to ensure their security. BEMIR PLUS reserves the right to transfer personal data to third parties - subcontractors. The above-mentioned entities are entrusted with the data to the minimum extent necessary to perform a given service, and each of these entities is obliged to comply with the rules and guidelines ensuring the security of personal data processed. At the same time, it should be stipulated that BEMIR PLUS may be obliged to provide personal data processed by operation of law by courts, prosecutor's office, law enforcement services, tax administration and other institutions and entities to which applicable law grants such a right. In addition, BEMIR PLUS declares that the entrusted personal data may be transferred to third countries outside the European Economic Area. Nowadays, many entities – even those located in the European Union – have server databases around the world, including in countries with legal systems providing for a narrower scope of personal data protection - which in itself may result in a higher probability of violating their security. At the same time, BEMIR PLUS does not sell or make available the entrusted data to any other entities. The processing of data entrusted to BEMIR PLUS by third parties is aimed only at the efficient implementation of the services provided by **BEMIR PLUS.**

BEMIR PLUS declares that the entrusted data may also be transferred to third parties in the person of accountants and accounting offices cooperating with BEMIR PLUS as part of the provision of the Service.

These entities will be entrusted with data to the extent necessary for the proper implementation of the Service, after the above-mentioned obligation to comply with the principles and guidelines adopted by BEMIR PLUS to ensure the security of personal data processed.

IV. Rights of the data subject

A person whose personal data is processed by BEMIR PLUS may request:

- 1. confirmation of the processing of your personal data by BEMIR PLUS together with the information indicated in Article 15(1) of the GDPR, also included in this privacy policy. At the same time, this person has the right to request a copy of his personal data, which are processed by BEMIR PLUS;
- 2. immediate rectification of their personal data or completion of incomplete data, if the data processed by BEMIR PLUS are contrary to their actual shape or incomplete in relation to the above-mentioned ones;
- 3. deletion of data processed by BEMIR PLUS in a situation where:
- 1. the data are no longer necessary for the purposes on which the processing is based;
- 2. the consent constituting the basis for the processing of personal data has been withdrawn by the person concerned;
- 3. a reasoned objection has been raised, as referred to later in this policy;
- 4. personal data have been processed by BEMIR PLUS unlawfully;
- 5. Whereas the obligation to erase personal data arises from provisions of Community or national law;
- 6. consent to the processing of personal data was given by a minor younger than
- 16 years.

In the case of making the data public, in the situation referred to above, the data subject may also request that the above-mentioned reasonable actions be taken (taking into account costs and available technology) aimed at notifying other controllers processing a copy or replication of data about the request to delete data (the so-called right to be forgotten);

4. restriction of data processed by BEMIR PLUS in a situation where:

- the person disputes the correctness of the data in the manner specified in point 2 above or in the face of the objection referred to in the further part of this privacy policy – for a period allowing BEMIR PLUS to check the correctness of the processed data or to recognize the legitimacy of the objection;
- 2. in a situation where, despite the contradiction of data processing with the law, the data subject, instead of deleting the data, only wants to limit their scope in the BEMIR PLUS file;
- 3. the need to process personal data for BEMIR PLUS has ceased, but the data subject needs their further processing for the purpose of establishing, pursuing or defending his or her claims;

During the period of restriction of the processing of personal data, BEMIR PLUS is entitled to store the data and their processing is possible only with the consent of the data subject, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person or for important reasons of public interest of the Union or a Member State.

5. issue it with the personal data it has provided to the controller in a structured, commonly used and machine-readable format. The data may be issued to the above-mentioned person and, where technically possible, transferred directly to the administrator indicated by the data subject. Refusal to comply with the above-mentioned requests by BEMIR PLUS must be justified by the provisions of generally applicable law, in particular in the GDPR. For the avoidance of doubt, it should be emphasized that any person who has consented to the processing of their data is entitled to limit and / or withdraw consent to the above-mentioned and oblige BEMIR PLUS to delete the processed personal data.

The data subject may exercise the rights discussed above by:

- 1. use of the form;
- 2. sending an appropriate request to the e-mail address of the Data Protection Officer <u>biuro@bemirplus.com</u>
- 3. sending an appropriate request to the address Bemir Plus Spółka z ograniczoną odpowiedzialnością with its registered office in Poznań, with the address Górecka 104, Poznań 61-483.

V. Objection

Regardless of the rights discussed in the previous paragraphs, the person to whom the processed data relates has the right to object to the processing of his personal data:

- 1. implemented within the framework of:
- 1. activities necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, i.e. pursuant to Article 6(1)(e) of the GDPR, or
- 2. protection of legitimate interests of BEMIR PLUS in a situation where the interests or fundamental rights and freedoms of the data subject do not prevail over the above-mentioned interests, i.e. pursuant to Article 6(1)(f) of the GDPR

In the event of an objection, BEMIR PLUS will immediately limit the processing of personal data on the terms set out in the previous chapter. Subsequently, in the event of a justified nature of the objection, personal data will be deleted by BEMIR PLUS, unless there are valid legitimate grounds for their further processing, overriding the interests, rights and freedoms of the data subject or the data will not constitute a basis for establishing, pursuing or defending claims.

The data subject may object by:

- 1. use of the form;
- 2. sending an appropriate request to the e-mail address of the Data Protection Officer biuro@bemirplus.com
- sending an appropriate request to the address Bemir Plus Spółka z ograniczoną odpowiedzialnością with its registered office in Poznań, with the address Górecka 104, Poznań 61- 483.

VI. Data Protection Officer and Supervisory Authority

The person appointed by BEMIR PLUS to supervise the security of personal data processing and to ensure the implementation of all rights provided for data subjects is the Data Protection Officer. Contact with the

Data Protection Officer in any matter regarding the processing of personal data is possible at the address infobemirplus@gmail.com or via traditional mail, sent to the address of Bemir Plus Spółka z ograniczoną odpowiedzialnością with its registered office in Poznań, with the address Górecka 104, Poznań 61- 483 with the note Data Protection Inspector.

VII. Final provisions

In matters not covered by this privacy policy, the provisions of generally applicable law, in particular the GDPR, shall apply. BEMIR PLUS reserves the right to change this privacy policy. This privacy policy comes into force on May 25, 2018