



PERSONAL DATA PRECESSING POLICY

I. DEFINITIONS

1. **Administrator** - INNUBIO limited liability company, based in Kalisz at ul. Cieszyńska 17, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto and Wilda in Poznań, IX Commercial Division of the National Court Register under KRS number: 0000718407, Tax ID: 6182170968; with share capital in the amount of PLN 5,000.00, paid in full

2. **Personal data** - all information about a natural person identified or identifiable by one or more specific factors determining the physical, physiological, genetic, psychological, economic, cultural or social identity, including image, voice recording, contact details, location data, information contained in correspondence, information collected via the recording equipment or other similar technology.

3. **Policy** - the Policy of processing personal data.

4. **RODO** - 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 the repeal of Directive 95/46 / EC.

5. **The person subject to precessing** - every natural person whose personal data is processed by the Administrator, e.g. a person visiting the Administrator's premises or directing to him an inquiry in the form of e-mail.

II. PROCESSING OF DATA BY ADMINISTRATOR

1. In connection with its business, the Administrator collects and processes personal data in accordance with the relevant regulations, in particular with the GDPR and the data processing rules provided for in them.

2. The administrator ensures transparency of data processing, in particular always informs on data processing at the time of collection, including about the purpose and legal basis of the processing - eg when concluding a contract for the sale of goods or services. The administrator makes sure that the data is collected only to the extent necessary for the purpose indicated and processed only for as long as it is necessary.

3. By processing data, the Administrator ensures their security and confidentiality as well as access to information on the processing of data subjects. If, despite the security measures applied, there has been a breach of the protection of personal data (eg "leak" or loss of data), the Administrator will inform the data subjects of such an event in a manner consistent with the provisions.

III. CONTACT WITH THE ADMINISTRATOR

1. The Administrator can be contacted via e-mail: kontakt@innubio.com, contact form at ul. Cieszyńska 17, 62-800 Kalisz, by phone at 62 597 76 88 or in writing to the address of INNUBIO Spółka z ograniczoną odpowiedzialnością.

2. The administrator has appointed a Data Protection Officer, which can be contacted via e-mail: kontakt@innubio.com in any matter regarding the processing of personal data.

IV. SECURITY OF PERSONAL DATA

1. In order to ensure the integrity and confidentiality of data, the Administrator has implemented procedures allowing access to personal data only to authorized persons and only to the extent that it is necessary due to the tasks performed by them. The administrator applies organizational and technical solutions to ensure that all operations on personal data are recorded and made only by authorized persons.

2. The Administrator also takes all necessary actions to ensure that its subcontractors and other cooperating entities guarantee appropriate security measures whenever they process personal data at the request of the Administrator.

3. The administrator conducts a risk analysis on an on-going basis and monitors the adequacy of the applied data protections to the identified threats. If necessary, the Administrator implements additional measures to increase data security.

V. OBJECTIVES AND LEGAL BASIS PROCESSING. NEXTBIKE INTERNET SERVICES

1. Personal data of all persons using the Administrator's website (www.innubio.com service), including IP addresses or other identifiers and information collected via cookies or other similar technologies, are processed:

a) in order to provide services electronically in terms of making available to users content collected on the site - then the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) (b) of the GDPR);

b) for analytical and statistical purposes - then the legal basis of the processing is a legitimate interest of the Administrator (Article 6 (1) letter f) to analyze users' activity as well as their preferences in order to improve the functionalities and services provided;

c) in order to possibly set and enforce claims or defend them - the legal basis of the processing is the legitimate interest of the Administrator (Article 6 (1) letter f) of the RODO, which consists in the protection of its rights;

d) for marketing purposes of the Administrator and other entities - the principles of processing personal data for marketing purposes are described in the "Marketing" section below.

2. The user's activity on the Administrator's website, including his personal data, are recorded in system logs (a special computer program used to store a chronological record containing information about events and activities regarding the IT system used to provide services by the Administrator). Information collected in logs is processed primarily for purposes related to the provision of services. The administrator also processes them for technical and administrative purposes, to ensure the security of the IT system and management of this system, as well as for analytical and statistical purposes - in this respect, the legal basis of processing is the legitimate interest of the Administrator (Article 6 paragraph 1 point f) RODO).

3. Session, which the user's web browser establishes with the Administrator's servers from the moment of logging in to logging out of the website, is protected by the SSL, TLS and HTTPS protocols. This means that all data, including personal data, are sent using cryptographic security (encryption).

VI. MARKETING

1. The administrator processes personal data of users in order to carry out marketing activities, which may consist in:

a) displaying to the user marketing content that is not adapted to his preferences (contextual advertising);

b) displaying to the user marketing content corresponding to his interests (behavioral advertising);

c) conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means and telemarketing activities).

2. In order to implement marketing activities, the Administrator may use profiling in some cases. This means that due to the automatic processing of data, the Administrator evaluates selected factors concerning natural persons in order to analyze their behavior or create a forecast for the future. The legal basis for data processing in this case is the legitimate interest of the Administrator (Article 6 (1) (f) of the RODO).

VII. COOKIES AND SIMILAR TECHNOLOGY

1. Cookies are small text files installed on the user's device browsing the site. Cookies collect information that facilitates the use of the website - for example, by memorizing the user's visits to the website and the activities carried out by him. The legal basis for the processing of such data is the legitimate interest of the Administrator (Article 6 (1) letter f of the RODO).

2. The administrator uses cookies primarily to provide the user with services provided electronically and improve the quality of these services. Therefore, the Administrator and other entities providing its analytical and statistical services use cookies by storing information or accessing information already stored in the user's telecommunications terminal equipment (computer, telephone, tablet, etc.). Cookies used for this purpose include:

- a) cookies with data entered by the user (session id) for the duration of the session (user input cookies);
- b) authentication cookies used for services requiring authentication for the duration of the session (authentication cookies);
- c) cookies used to ensure security, e.g. used to detect fraud in the field of authentication (user centric security cookies);
- d) session cookies of multimedia players (eg flash player cookies), for the duration of the session (multimedia player session cookies);
- e) permanent cookies used to personalize the user interface for the duration of the session or a bit longer (user interface customization cookies),
- f) cookies used to monitor traffic on the website, i.e. data analytics, including Google Analytics cookies (these are files used by Google to analyze how to use from the site by the user, to create statistics and reports on the operation of the website). Google Analytics also serves the purpose of targeting behavioral advertising to users. Google does not use the collected data to identify you or link this information to allow identification. Detailed information about the scope and rules of data collection in connection this service can be found under the link: [Google - Privacy and Terms](#).

VIII. CONTACT FORMS AVAILABLE ON INTERNET

1. The administrator provides the opportunity to contact him using electronic contact forms, available on the Administrator's websites. Using the form requires providing personal data necessary to contact the user and reply to the request. The user may also provide other data to facilitate contact or service of the inquiry. Providing data marked as mandatory is required in order to receive and service the request, and failure to do so results in a lack of service. Providing other data is voluntary.

2. Personal data is processed:

- a) in order to identify the Client, Partner and handle the request or answer the question sent via the contact form - the legal basis of the processing is the interest of the Administrator (Article 6 paragraph 1 point f) of the RODO to

enable handling requests and providing answers to questions asked in particular by people interested in Administrator's services;

b) to monitor and improve the quality of services, including customer service - the legal basis for processing is the Administrator's legitimate interest (Article 6 (1) (f) of the RODO) enabling the improvement of the services provided by the Administrator.

IX. E-MAIL AND POSTAL CORRESPONDENCE

1. In the case of referral to the Administrator via e-mail or traditional correspondence, personal data contained in this correspondence are processed solely for the purpose of communication and resolution of the matter addressed by the correspondence.

2. The legal basis of the processing is the justified interest of the Administrator (Article 6 (1) letter f) of the RODO, consisting in the correspondence addressed to him in connection with his economic activity.

3. The administrator processes only personal data that is relevant to the case to which the correspondence relates. All correspondence is stored in a manner ensuring the security of personal data (and other information) contained in it and disclosed only to authorized persons.

X. PHONE CONTACT

1. In the case of contacting the Administrator by phone, the Administrator may request personal data only if it is necessary to handle the matter to which the contact relates. The legal basis in this case is the justified interest of the Administrator (Article 6 (1) (f) of the RODO) consisting in enabling the handling of requests and answering questions asked by persons interested in the Administrator's services.

2. Telephone calls can also be recorded - in this case, appropriate information is conveyed at the beginning of the conversation. Calls are recorded in order to monitor the quality of the service provided and verify the work of consultants. The recordings are available only to the employees of the Administrator and persons servicing the Administrator's hotline. The legal basis of the processing is the justified interest of the Administrator (Article 6 (1) letter f) of the RODO, which consists in enabling the improvement of the quality of services provided by the Administrator.

XI. SOCIAL MEDIA

The administrator processes personal data of users visiting the Administrator's profiles on social media (Facebook, YouTube, Instagram, Twitter). These data are processed exclusively in connection with running a profile, including to inform Users about the activity of the Administrator and to promote various types of events, services and products. The legal basis for the processing of personal data by the Administrator for this purpose is its legitimate interest (Article 6 (1) letter f) of the RODO, which consists in promoting its own brand.

XII. VISUAL MONITORING AND INTRODUCTION CONTROL

1. In order to ensure the safety of persons and property, the Administrator uses visual monitoring and controls access to premises and the area he manages. Data collected in this way are not used for any other purposes.

2. Personal data in the form of recordings from monitoring and data collected in the register of entries and exits are processed in order to ensure security and order on the premises and possibly to defend against claims or to investigate them. The basis for the processing of personal data is the legitimate interest of the Administrator (Article 6 paragraph 1 letter f) of the RODO consisting in ensuring the Administrator's security and protection of his rights.

XIII. COLLECTION OF DATA IN OTHER CASES

1. In connection with the conducted activity, the Administrator collects personal data also in other cases - eg during business meetings, at industry events or through exchange of business cards - for purposes related to initiating and maintaining business contacts. The legal basis for processing is in this case the justified interest of the Administrator (Article 6 (1) (f) of the RODO) consisting in creating a network of contacts in connection with the conducted activity.
2. Personal data collected in such cases are processed only for the purpose for which they were collected, and the Administrator provides them with adequate protection.

XIV. DATA RECEIVERS

1. In connection with conducting business requiring processing, personal data is disclosed to external entities, including in particular suppliers responsible for the operation of IT systems and equipment (eg CCTV equipment, GPS location services), entities providing legal or accounting services, couriers, marketing agencies or recruitment. The data may also be disclosed to selected Administrator's partners, e.g. as part of promotional campaigns to which the data subject joined
2. The Administrator reserves the right to disclose selected information about the data subject to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with the applicable law.

XV. TRANSMISSION OF DATA OUTSIDE THE EEA

1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Administrator transfers personal data outside the EEA only when it is necessary and with an adequate level of protection, primarily through:
 - a) cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;
 - b) use of standard contractual clauses issued by the European Commission;
 - c) application of binding corporate rules approved by the competent supervisory authority;
 - d) in the case of data transfer to the USA - cooperation with entities participating in the Privacy Shield program approved by the decision of the European Commission.
2. The administrator always informs about the intention to transfer personal data outside the EEA at the stage of collection.

XVI. PERIOD OF PROCESSING OF PERSONAL DATA

1. The period of data processing by the Administrator depends on the type of service provided and the purpose of the processing. The data processing period can also result from the rules when they form the basis for processing. In the case of data processing based on the justified interest of the Administrator - for example for security reasons - the data is processed for a period of time enabling this interest to be realized or for reporting effective opposition to data processing. If the processing is based on consent, the data is processed until it is withdrawn. When the processing basis is a necessity to enter into and perform the contract, the data is processed until it is resolved.
2. The data processing period may be extended if the processing is necessary to establish or enforce claims or defend against claims, and after this period - only in the case and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

XVII. AUTHORISATION RELATED TO THE PROCESSING OF PERSONAL DATA AND THE RIGHTS OF PERSONS WHOSE DATA ARE PROCESSED

The data subjects have the following rights:

1. the right to information about the processing of personal data - on this basis, the person making the request transfers information about the processing of data, in particular about the purposes and legal grounds for processing, the scope of data held, entities to which they are disclosed and the planned date of data deletion;
2. the right to obtain a copy of data - on this basis, the Administrator provides a copy of the data processed concerning the person making the request;
3. the right to rectify - the Administrator is obliged to remove any incompatibilities or errors of personal data being processed and to supplement them if incomplete;
4. the right to delete data - on this basis you can request deletion of data, the processing of which is no longer necessary to carry out any of the purposes for which they were collected;
5. the right to limit processing - if such a request is made, the Administrator ceases to perform operations on personal data - except for operations agreed to by the data subject and their storage, in accordance with accepted retention rules or until the reasons for the processing limit cease to exist data (eg a decision of the supervisory authority will be issued allowing further processing of data);
6. the right to transfer data - on this basis - to the extent that the data is processed in a relationship with the concluded agreement or consent - the Administrator issues data provided by the person they concern in a format that allows their reading by a computer. It is also possible to request that data to be sent to another entity - provided, however, that there are technical possibilities in this regard on the part of the Administrator as well as the other entity;
7. the right to object to the processing of data for marketing purposes - the data subject may at any time object to the processing of personal data for marketing purposes, without the need to justify such objection;
8. the right to object to other purposes of data processing - the data subject may at any time object to the processing of personal data which takes place on the basis of a justified interest of the Administrator (eg for analytical or statistical purposes or for reasons related to with property protection); objection in this respect should contain justification;
9. the right to withdraw consent - if the data is processed on the basis of the expressed consent, the data subject has the right to withdraw it at any time, but this does not affect the lawfulness of the processing carried out prior to the withdrawal of the consent.
10. the right to complain - in the event that the processing of personal data is found to violate the provisions of the RODO or other provisions on the protection of personal data, the data subject may file a complaint to the President of the Office for the Protection of Personal Data.

XVIII. SUBMISSION OF DEMANDS RELATED TO THE IMPLEMENTATION OF THE RIGHTS

1. An application for the exercise of the rights of data subjects may be submitted:
 - a) in writing to the following address: ul. Cieszyńska 17, 62-800 Kalisz;
 - b) by e-mail to the following address: kontakt@innubio.com
2. If the Administrator is not able to identify the person submitting the application on the basis of the submitted application, he will ask the applicant for additional information.

3. The application may be submitted in person or through a proxy (eg a family member). For reasons of data security, the Administrator encourages the use of a power of attorney in a form certified by a notary public or an authorized legal advisor or attorney, which will significantly speed up the verification of the authenticity of the application.

4. A response to the notification should be given within one month of its receipt. If it is necessary to extend this deadline, the Administrator informs the applicant about the reasons for the delay.

5. The reply is provided via traditional mail, unless the request has been made by e-mail address or request for a reply in electronic form.

6. The data subject may also rectify or update his personal data himself, as well as withdraw his consent to the processing of personal data and to transfer marketing information using the Administrator's websites. To do this, log in to the website (eg www.nextbike.pl), go to the "User settings" tab and make appropriate changes.

XIX. RULES OF FEE PAYEMENT

1. Proceedings regarding submitted applications are free of charge. Fees can only be charged in case of:

a) requesting the second and each subsequent copy of the data (the first copy of the data is free); in this case, the Administrator may request a fee of PLN 10. The above fee includes administrative costs related to the fulfillment of the request.

b) reporting by the same person excessive demands (eg extremely frequent) or clearly unjustified; in such a case, the Administrator may request a payment of PLN 100.

The above fee includes the costs of communication and the costs associated with taking the required actions.

2. In the event of challenging the decision on imposing a fee, the data subject may file a complaint to the President of the Office for the Protection of Personal Data.

XX. CHANGES OF PERSONAL DATA PROCESSING POLICY

The policy is verified on an ongoing basis and updated if necessary. The current version of the Policy was adopted on August 01. 2019.