

## Privacy Policy of cardby.co

In order to ensure the transparency of the processing carried out, we present the rules of personal data protection in effect at Netsphere, established on the basis 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 (General Data Protection Regulation, hereinafter "**GDPR**").

### 1. Definitions

1. **Administrator** - a natural or legal person, public authority, entity or other entity that alone or jointly with others determines the purposes and means of processing personal data – Netsphere sp. z o.o. with its registered office in Warszawa, ul. Świeradowska 47 Warszawa, entered in the Register of Businesses of the National Court Register by the District Court For Capital City Of Warszawa in Warszawa, 13th Economic Department of the National Court Register under no. KRS: 0001128930, NIP: 5214087219 and REGON: 52973361200000 (hereinafter: „**Netsphere**”).
2. **Personal data** - information about a natural person identified or identifiable by one or more specific factors determining physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact data, location data, information contained in correspondence, information collected through recording equipment or other similar technology.
3. **Data Subject** - an individual who is the subject of Personal data processed by the Administrator, i.e. a person who directs an email inquiry to the Administrator.
4. **Policy** - this Privacy Policy.
5. **Terms and conditions** - the Terms and conditions of the web domain cardby.co
6. **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

7. **Service** - the website available at [cardby.co](http://cardby.co), administered by the Administrator.
8. **User** - any natural person visiting the Service or using one or more of the services or features described in the Policy.

## 2. DATA PROCESSING BY THE ADMINISTRATOR

1. In connection with its business activities, the Administrator collects and processes Personal data in accordance with the relevant regulations, including in particular the GDPR and the data processing rules provided therein.
2. The Policy is applicable to all persons and entities using the Service, as well as using the services provided by Netsphere and the functionalities offered by Netsphere.
3. Administrator:
  - ensures transparency of data processing;
  - always informs about data processing at the time of collection, in particular about the purpose and legal basis of Personal data processing, unless he/she is not obliged to do so under separate regulations;
  - ensures that data are collected only to the extent necessary for the stated purpose and are processed only for the period of time necessary,
  - when processing the data, the Administrator shall ensure the security and confidentiality of the data and access to information about the processing to the Data Subjects. If, despite the security measures in place, a breach of personal data protection (e.g., data “leakage” or data loss) were to occur and such a breach could cause a high risk of infringement of the rights or freedoms of Data Subjects, the Administrator shall inform Data Subjects of such an event in a manner consistent with the regulations.

## 3. CONTACT WITH THE ADMINISTRATOR AND DATA PROTECTION OFFICER

Contact with the Administrator is possible only in Polish or English via e-mail address: [netsphere@gmail.com](mailto:netsphere@gmail.com) or mailing address: ul. Świeradowska 47, 02-622 Warszawa.

#### **4. SECURITY OF PERSONAL DATA**

1. In order to ensure data integrity and confidentiality, the Administrator has implemented procedures that allow access to Personal data only to authorized persons and only to the extent that it is necessary due to the tasks they perform. The Administrator uses organizational and technical solutions to ensure that all operations on Personal data are recorded and performed only by authorized persons.
2. The Administrator shall take all necessary measures to ensure that its subcontractors and other cooperating entities also provide guarantees to apply appropriate security measures whenever they process Personal data on behalf of the Administrator.
3. The Administrator conducts a risk analysis on an ongoing basis and monitors the adequacy of the data security measures applied to the identified risks. If necessary, the Administrator implements additional measures to enhance data security.
4. In collecting and processing Personal data, the Administrator is guided by the following principles:
  - lawfulness, fairness and transparency: processing of Personal data is carried out in a lawful, fair and transparent manner;
  - purpose limitation: the collection of Personal data is carried out only for specific, explicit and legitimate purposes, and the data is not further processed in a manner incompatible with those purposes;
  - data minimization: the collection of personal data is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed;
  - accuracy: personal data is accurate and updated as necessary. We take all reasonable steps to be able to promptly delete or correct erroneous personal data - in accordance with the purposes for which it is processed;
  - storage limitation: personal data are kept so that the person to whom they relate can be identified for no longer than is necessary for the purposes for which the personal data are processed;

- integrity and confidentiality: Personal data shall be treated as confidential and stored in a manner that ensures adequate security. Personal data shall not be shared with third parties unless it is necessary and has a legitimate legal basis.

## **5. PERSONAL DATA COLLECTED**

The Administrator collects the following Personal data of Users:

- e-mail address;
- telephone number;
- in the case of persons declaring the fact of conducting a business, additionally: full name of the entrepreneur (company), NIP, REGON, business address.

## **6. PURPOSES AND LEGAL BASIS FOR PROCESSING**

### **1. INTERNET SERVICE**

1. In connection with the User's use of the Service, the Administrator collects data to the extent necessary to provide individual services, as well as information about the User's activity within the Service.
2. Personal data of all persons using the Service (including IP address or other identifiers and information collected through cookies) are processed by the Administrator:
  - for the proper functioning of the Service - necessary files: processed on the basis of the Administrator's justified interest (Article 6.1.f GDPR);
  - for the purpose of studying Service traffic, learning Users' preferences, analyzing their behavior on the Service and enabling interaction with external networks and platforms - statistical files: processed on the basis of the user's voluntary consent (Article 6(1)(a) GDPR);

- for the purpose of displaying ads adjusted to the profile of the user visiting the site. Based on browsing history, profiles are built and shared with advertising partners so that personalized ads are displayed on other sites - marketing files (Article 6(1)(a) GDPR).

## **2. PROVIDE DIRECT PAYMENT SERVICE (PayPro)**

The Administrator processes Personal data for the purpose of entering into and executing a contract for the provision of services (Article 6(1)(b) of the GDPR) and also for the purpose of possibly establishing, pursuing or defending against claims based on the Administrator's legitimate interest in protecting its rights (Article 6(1)(f) of the GDPR). Provision of data is voluntary, but necessary to conclude a contract.

## **3. CONTACT FORM**

The Administrator provides the possibility to contact him using an electronic contact form. Using the form requires providing Personal data necessary to make contact and respond to the inquiry. Provision of data marked as mandatory is required in order to receive and service the inquiry, and their failure to provide data will result in the impossibility of service. Provision of other data is voluntary. Personal Data is processed in order to identify the sender and handle his/her inquiry sent via the form provided - the legal basis for processing in order to handle the inquiry sent via the contact form is Article 6(1)(f) of the GDPR, and in terms of data provided optionally, the legal basis for processing is consent (Article 6(1)(a) of the GDPR).

## **4. E-MAIL CORRESPONDENCE**

In the case of correspondence addressed to the Administrator via e-mail that is not related to the services provided to a person or any other contract concluded with him, the Personal data contained in such correspondence is processed solely for the purpose of communication and resolution of the matter to which the correspondence relates.

- the legal basis for the processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR) consisting of correspondence addressed to it in connection with its business activities;
- The Administrator processes only Personal data relevant to the matter to which the correspondence relates.

## **5. CUSTOMER SATISFACTION SURVEY**

In the case of conducting a customer satisfaction survey consisting of sending an electronic survey to the customer, the Personal data indicated in the survey is processed on the basis of the Administrator's legitimate interest (Article 6(1)(f) GDPR) in improving the products offered and services provided.

## **6. MARKETING**

The Administrator will process Personal data for the purpose of sending marketing content via the communication channel to which the User has voluntarily consented, i.e. via electronic message to the indicated e-mail address and/or telephone notifications (SMS/MMS), for the purpose of presenting commercial offers and sending personalized information about products and services - on the basis of the Administrator's legitimate interest (Article 6(1)(f) GDPR).

## **6. TIME OF PROCESSING PERSONAL DATA**

1. The duration of data processing by the Administrator depends on the type of service provided and the purpose of the processing. As a general rule, data is processed for the duration of the service, until the withdrawal of the consent given or until an effective objection to data processing is raised in cases where the legal basis for data processing is the legitimate interest of the Administrator. Data collected for the purpose of sending marketing content will be processed until an objection to the processing is raised or until the consent to the chosen communication channel is withdrawn, as to which such consent has been given. Data obtained in the process of customer satisfaction surveys will be processed until the purpose for which they were collected ceases to exist or until an objection to the processing is raised; Data obtained through cookies will be processed in accordance with the provisions of Section X of this Policy.
2. The processing period may be extended if the processing is necessary for the establishment and assertion of possible claims or defense against claims, and thereafter only if and to the extent required by law. After the expiration of the processing period, the data shall be irreversibly deleted or anonymized.

## **7. DATA RECIPIENTS**

1. The Personal data processed by Netsphere may be disclosed to external entities, including, in particular, suppliers responsible for operating IT systems, entities providing accounting, legal or technical services to the Administrator.
2. In justified cases, based on an appropriate legal basis, Personal data may be made available to authorities or third parties who make a request for such information.
3. As a rule, the Administrator does not transfer data outside the European Economic Area (EEA). However, if necessary, data is transferred with an adequate degree of protection, primarily by:
  - cooperation with processors of Personal data in countries for which a relevant decision of the European Commission has been issued regarding the determination of ensuring an adequate level of protection of Personal data;
  - applying standard contractual clauses issued by the European Commission;
  - application of binding corporate rules approved by the relevant supervisory authority.
4. The Administrator always informs about its intention to transfer Personal data outside the EEA at the stage of collection.

## **8. RIGHTS OF DATA SUBJECTS**

1. Each User whose personal data is processed by the Administrator has the right:
  - access to the content of your personal data,
  - rectification of data,
  - deletion of data,
  - limitation of data processing,

- data portability,
  - object to processing taking place on the basis of the legitimate interest of the controller,
  - the right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of that consent before its withdrawal.
2. User also may file a complaint with the President of the Personal Data Protection Office if they consider that the processing violates the provisions of the General Data Protection Regulation.

## **9. COOKIES**

1. The cardby.co (Service) uses cookies to enable or improve the operation of the Service, as well as to obtain reports using (among others) Google Analytics or Hotjar.
2. Cookies may be used by partners of the Service.
3. The rules for the use of cookies by the Service's partners are set forth in the respective policies and regulations applied by the partners.

## **10. FINAL PROVISIONS**

1. The Privacy Policy is reviewed on an ongoing basis and updated as necessary. The Administrator may amend and supplement the provisions of the Privacy Policy as needed due to changes in the conditions for processing Personal data or applicable laws. The amended and updated Privacy Policy shall be published by posting an appropriate notice within the Service.
2. The current version of the Policy was adopted and is effective as of April 26, 2024.