

PRIVACY POLICY

I. Introduction

This document describes the Privacy Policy of Soflab Technology Sp. z o.o., having its registered office in Katowice (40-568), ul. Ligocka 103 (hereinafter: Soflab Technology). This Privacy Policy of Soflab Technology (hereinafter: Policy) defines the rules, mode of processing as well as the use of the data and information originating from the Users of all Websites.

Please read this Policy carefully. When accessing a website owned by Soflab Technology or using the website and sending us any Personal Data in connection with training registration, recruitment, requests for proposals etc., and by confirming that they have read this Policy, the User accepts this Policy, and confirms that they have read and understood its content.

II. Definitions

The **Controller** of Personal Data (Controller) means Soflab Technology Spółka z ograniczoną odpowiedzialnością, having its registered office in Katowice (40-568), ul. Ligocka 103, entered into the register of entrepreneurs of the National Court Register, maintained by the District Court for Katowice-East in Katowice, 8th Commercial Department, under KRS no. KRS 0000291341, tax ID (NIP) 6342673805, statistical no. (REGON) 240677886, which provides services by means of electronic communication as well as stores and accesses information on the User's devices.

Personal Data means any information relating to an identified or identifiable natural person by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including IP address of the device, location data, online ID and information collected through cookies and similar technologies.

GDPR means Regulation (EU) 2016/679 of the European Parliament and of the Council of 7 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.

Website means a webpage or an application under which the Controller operates a website in the domain(s) soflab.pl and www.fabrykajakosci.pl.

Device means an electronic device through which the User accesses the Website.

User means a person for whom services may be provided by means of electronic communication according to the Terms and Conditions and the applicable laws, or with whom an Agreement may be concluded for the provision of services by means of electronic communication.

Own Cookies mean cookies saved by the Controller in connection with the provision of services by means of electronic communication through the Website.

Third-party Cookies mean cookies saved by the Controller's partners through the Website.

III. Purposes and legal basis of the processing of data on the Website

A. Use of the Website and processing of Personal Data

Your data is processed when you use the Website as a User. This data includes your IP address or other identifying data as well as information collected through Cookies or similar technologies.

The User's activity on the Website and his/her Personal Data are recorded in system logs. The information collected in the logs is processed primarily for the purposes relating to the provision of services, i.e.:

- for the purpose of sending to the Users' e-mail addresses commercial and marketing information, provided that the User has given consent to receive such information;
- for the purpose of sending to the Users' e-mail addresses and phone numbers replies to their queries sent using a contact form, provided that the User has given consent to be contacted by means of electronic communication;
- for the purpose of examining job applications sent by the Users and for the purpose of a recruitment process, once the User has given consent to the processing of his/her data included in a CV or a form by Soflab Technology;
- for the purpose of organising and conducting open and dedicated training courses, including for the purpose of the Testers' Academy;
- for analytical and statistical purposes, in order to constantly improve the quality of the services provided through the Website and to adapt the Website's functionality to your needs. In such a case, the legal basis for processing is the legitimate interest pursued by Soflab Technology consisting in analysing the Users' activity and preferences;
- for the purpose of identifying abuse as well as identifying and preventing threats to the stability and proper operation of the Website.

B. Processing of Personal Data for the purpose of recruitment

Soflab Technology recruits for positions within Soflab Technology Sp. z o.o.'s organisational structure and does not plan to disclose your Personal Data to any other recipients.

The Personal Data provided will be processed until the completion of the recruitment process, for up to 12 months from having been received.

The User is obliged to provide the required Personal Data referred to in Article 22 § [1] of the Labour Code. If the User refuses to provide such data, his/her application will not be considered in the recruitment process.

The User can at any time withdraw his/her consent to continued processing, which does not affect the lawfulness of processing based on his/her consent before its withdrawal.

C. Processing of Personal Data for marketing purposes

When sending a query, or registering for a training course or another event organised by Soflab Technology, the User can give consent to the processing of his/her Personal Data for the purpose of sending marketing information about products and services offered by Soflab Technology. This consent can be withdrawn at any time using, subject to the terms of this Policy.

D. Processing of Personal Data for the purpose of organising and conducting training courses

One of the areas of Soflab Technology's activity is open and dedicated training courses, and the Testers' Academy. Therefore, Soflab Technology will process the Personal Data of Users who register for these training courses to the extent necessary to organise and conduct the courses.

E. Contact forms

We provide a contact option using electronic contact forms. Using the form requires that you provide your Personal Data so that we can contact you and answer your query. You can also provide other data to facilitate contact or the processing of your query. The data marked as required must be provided so that we can receive and process your query. It will not be possible to process a query without this data. The remaining data is provided on a voluntary basis.

F. Types of cookies used by the Websites

Soflab Technology represents that it uses Cookies on its Websites. The Cookies used by the Controller are safe for the User's Device. In particular, it is not possible for viruses, malware or other unwanted software to access User Devices through Cookies. These files allow us to identify the User's software and personalise the Website according to each User's needs. Cookies typically include the name of the domain from which they originate, time of storage on the Device and an assigned value.

The Controller uses two types of Cookies:

Session Cookies are stored on the User's Device until the end of a browser session. Any saved information is then permanently deleted from the memory of the Device. Session Cookies do not allow any personal data or confidential information to be downloaded from the User's Device.

Persistent Cookies are stored on the User's Device until they are deleted. Ending a browser session or turning off the Device does not delete these Cookies from the User's Device. Persistent Cookies do not allow any personal data or confidential information to be downloaded from the User's Device.

The User can restrict or block the access of Cookies to his/her Device. If the User chooses this option, it will be possible to use the Website, except for any functions which require the use of Cookies.

G. Purposes for which Cookies are used

1. The Controller uses its Own Cookies for the following purposes:

a. Website configuration

- Adapting the content of the Website's pages to the User's preferences and optimising the use of the pages.
- Recognising the device of the Website's User and displaying a webpage that is personalised to his/her individual needs.

b. Maintaining the User's session on the Website

- Optimising and improving the efficiency of the services provided by the Controller.

c. Implementing processes necessary to ensure full functionality of webpages

- Adapting the content of the Website's pages to the User's preferences and optimising the use of the pages. In particular, these files allow us to recognise

the basic parameters of the User's Device and properly display a webpage that is personalised to his/her individual needs.

d. Analysis, research and traffic audit

- Generating anonymous statistics which help us understand how the Website's Users interact with the Website pages, allowing us to improve its structure and content.

e. Ensuring safety and reliability of the Website

2. The Controller uses Third-party Cookies for the following purposes:

a. Collecting general and anonymous statistical data through analytical tools: Google Analytics [controller of Cookies: Google Inc, based in the USA].

H. Options to determine the conditions of the storage of or access by Cookies

The User can, at any time, change the Cookies settings by determining the conditions for their storage on and access to the User's Device. To change the settings referred to in the previous sentence, the User can use the browser settings or the service configuration. These settings can be changed, in particular, in such a way so as to block the automatic handling of Cookies in the browser settings or to receive a prompt each time when Cookies are saved on the User's device. Details on the options and modes of handling Cookies can be found in the software (browser) settings.

At any time, the User can delete the Cookies by accessing the functions available in the browser being used.

Restricting the use of Cookies may affect certain functionalities available on the Website's page.

IV. Provision of Personal Data

By providing his/her Personal Data on the Website, the User confirms that he/she is authorised to disclose the data which will be used by Soflab Technology as described in this Policy.

V. User rights

The User has the following rights concerning the protection of his/her Personal Data in connection with such data being processed by Soflab Technology:

- the right of access and right to request rectification,
- the right to erasure,
- the right to restriction of processing,
- the right to data portability,
- the right to object to the processing of data, and
- the right to lodge a complaint with a supervisory authority – the President of the Office for the Protection of Personal Data (Urząd Ochrony Danych Osobowych).

Concerning his/her rights, the User can at any time withdraw his/her consent to continued processing of his/her Personal Data by sending a message to wycofanie.zgody.RODO@soflab.pl, and such withdrawal will not affect the lawfulness of processing based on his/her consent before its withdrawal.

We reserve the right to disclose any information to competent authorities or third parties that request such information under the applicable legal basis and according to the applicable laws.

VI. Processing period of Personal Data

Your data will be processed if you use the Website as a User. Cookies, a user agent and any tabs and information you have accessed on the Website will be stored on your device.

The Personal Data provided for the purpose of recruitment will be processed by the Controller until the completion of the recruitment process, for up to 12 months from having received such data.

The Personal Data provided based on separate consent for marketing purposes will be processed for 3 years from the day when the consent is given.

The User's Personal Data provided in a contact form or by e-mail will be processed for the purpose of handling a query for up to 1 month from having been received, unless consent is given for a longer processing period.

The Controller reserves that the processing period of the Personal Data may be extended each time by the period of limitation of any claims concerning the User, or when the processing is necessary for making claims or defending against claims made by others.

VII. Safety rules

Soflab Technology has implemented suitable organisational and technical safety measures in order to protect the Personal Data against loss, misuse, unlawful processing or alteration. The Controller undertakes to protect all information disclosed by Users according to the applicable security and confidentiality standards. Access to the Users' Personal Data is restricted in such a way that the data cannot be accessed by unauthorised individuals. Personal Data can be accessed only by authorised employees of Soflab Technology.

Soflab Technology has a right to disclose the data to entities which are authorised under the applicable laws.

VIII. Contact us

If you have any questions concerning the Privacy Policy and the protection of your Personal Data, please contact Soflab Technology by post or by e-mail soflab@soflab.pl.

IX. Policy revisions

Protecting your Personal Data is a dynamic and ever-changing process. This Policy is verified and revised on a continuous basis to ensure that your rights are protected as effectively as possible. Users will be notified of any revisions through the Website or by e-mail.

This Policy takes effect as of 25 May 2018.