

PRIVACY POLICY OF THE WEBSITE

INAVII.COM

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1. GENERAL PROVISIONS

- 1.1.** This Privacy Policy is for informational purposes only, which means that it does not constitute any obligation for Service Users. The Privacy Policy primarily contains rules concerning the processing of personal data by the Administrator on the Website, including the basis, purposes as well as duration of personal data processing and the rights of data subjects, as well as information concerning the use of Cookies and analytics tools used on the Website.
- 1.2.** The Administrator of personal data collected through the Website is WEB-HERO Tomasz Katra, entered in the Central Registration and Information on Business in the Republic of Poland kept by a minister in charge of economy, with principal place of business and address for service: Bilsko 294, 33-314 Lososina Dolna, Poland, VAT/ Taxpayer ID Number (NIP): 7343056245, Business ID Number (REGON): 367878988, email address: support@inavii.com – hereinafter referred to as the “Administrator” who is at the same time the Service Provider.
- 1.3.** Personal data is collected through the Website by the Administrator in accordance with applicable legal provisions, in particular in accordance with 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 and the free transfer of personal data and the repeal of Directive 95/46/EC (General Data Protection regulation) – hereinafter referred to as “GDPR” or “General Data Protection Regulation”. The official text of the GDPR:
<http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>.
- 1.4.** The use of the Website is voluntary. Similarly, the submission of personal data by the Service Recipient using the Website is voluntary, subject to two exceptions: (1) **conclusion of Sales Agreements with the Administrator** – failure to provide personal data necessary to conclude and perform an Agreement for providing an Electronic Service with the Administrator and within the scope indicated on the Website, the Terms and Conditions of the Website and this Privacy Policy, which are necessary for conclusion and realization of the Sales Agreement for providing an Electronic Service (e.g. Account) results in the inability to conclude the Sales Agreement. Providing personal data in such a case is considered a contractual requirement and therefore the Service User who wishes to conclude the Sales Agreement with the Administrator is obliged to provide required personal data. Each time, the scope of data required to conclude the Sales Agreement is indicated beforehand on the Website and in the Terms and Conditions of the Website; (2) **statutory Administrator obligations** – providing personal data is a statutory requirement resulting from generally applicable laws which impose on the Administrator the obligation to process personal data (e.g. processing of data for tax or accounting purposes) and failure to provide such data prevents the Administrator from fulfilling these obligations.
- 1.5.** The Administrator takes particular care to protect the interests of data subjects, whose personal data processed by the Administrator relate to, and in particular is responsible and ensures that the data he collects are: (1) lawfully processed; (2) collected for specified, legally justified purposes and not further processed in a way incompatible with those purposes; (3) substantially correct and appropriate in relation to the purposes for which they are processed; (4) kept in a form which permits identification of persons for no longer than is necessary to achieve the

purpose of processing and (5) processed in a way that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures.

- 1.6. Having regard to the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons of varying probability and gravity, the Administrator implements appropriate technical and organizational measures to ensure that the processing is carried out in accordance with this Regulation and to be able to demonstrate it. These measures are reviewed and updated as necessary. The Administrator uses technical measures to prevent unauthorized persons from acquiring and modifying personal data sent electronically.
- 1.7. All words, phrases and acronyms appearing in this Privacy Policy and beginning with a capital letter (e.g., Service Provider, Website, Electronic Service) are understood as defined in the Terms and Conditions of the Website available on the Website.

2. THE GROUNDS FOR DATA PROCESSING

- 2.1. The Administrator is entitled to process personal data where, and to the extent that, one or more of the following conditions are met: (1) the data subject has consented to the processing of his/her personal data for one or more specified purposes; (2) the processing is necessary for the conclusion of an agreement to which the data subject is party or to take steps at the request of the data subject prior to entering into an agreement; (3) processing is necessary for compliance with a legal obligation of the Administrator; or (4) processing is necessary for the purposes of legitimate interests pursued by the Administrator or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- 2.2. The processing of personal data by the Administrator each time requires the occurrence of at least one of the grounds indicated in Point. 2.1 of this Privacy Policy. Specific grounds for processing the personal data of the Service Recipients by the Administrator are indicated in the next point of the Privacy Policy - with reference to a given purpose of personal data processing by the Administrator.

3. PURPOSE, BASIS FOR AND DURATION OF DATA PROCESSING ON THE WEBSITE

- 3.1. In each case, the purpose, basis and period as well as the recipients of the personal data processed by the Administrator arise from the activities undertaken by the given Service Recipient on the Website.
- 3.2. The Administrator may process personal data on the Website for the following purposes, on the following grounds, during the following periods and to the following extent:

Purpose of data processing	Legal basis for processing and data retention period
Fulfilment of a Sales Agreement concluded with the Administrator (e.g., using the Electronic Service - Newsletter) or taking action at the request of the data subject prior to concluding a Sales Agreement	Article 6(1)(b) of the RODO Regulation (fulfilment of an Agreement) The data shall be stored for the period necessary to execute, terminate or otherwise expire concluded Sales Agreement.
Direct marketing	Article 6(1)(f) of the GDPR (legitimate interest of the controller) The data shall be stored for the period of time during which there is a legitimate interest pursued by the Administrator, however, no longer than for the period of prescription of claims against the data subject resulting from the Administrator's business activities. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years).

	The Administrator may not process the data for direct marketing purposes if the data subject has raised an effective objection in this respect.
Marketing the Administrator's services and products	Article 6(1)(a) of the GDPR (the consent) Any data shall be stored until the data subject withdraws their consent to the further processing of their data for this purpose.
Determining, pursuing or defending claims that Administrator may assert or that may be asserted against Administrator	Article 6(1)(f) of the GDPR The data shall be stored for the period of existence of the legitimate interest pursued by the Administrator, however, no longer than for the period of the statute of limitations for claims against the Administrator or the data subject for the business activities conducted by the Administrator (the basic limitation period for claims against the Administrator is six years).
Responding to the Service Recipient or Service User's request	Article 6(1)(f) of the GDPR (legitimate interest of the Administrator) - processing is necessary for purposes deriving from the Administrator's legitimate interests - consisting in providing support to Service Recipients or Service Users. The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, not longer than the period of limitation of the Administrator's claims against the data subject. The period of limitation is specified by law, in particular by civil law (the basic limitation period for claims related to the running of a business activity is three years).
Using the Website and ensuring the proper operation of the Website	Article 6(1)(f) of the GDPR (legitimate interest of the Administrator) - the processing is necessary for the purposes arising from the Administrator's legitimate interests - consisting in running and maintaining the Website. The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, no longer than for the period of expiration of the statute of limitations for claims of the Administrator against the data subject on account of the Administrator's business activities. The period of limitation is determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years).
Conducting statistics and analysis of traffic on the Website	Article 6(1)(f) of the GDPR (legally justified interest of the Administrator) - processing is necessary for purposes stemming from the Administrator's legitimate interests - consisting in statistics and analysis of traffic on the Website in order to improve the functioning of the Website and promote the Application. The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, no longer than for the period of expiration of the statute of limitations for claims of the Administrator against the data subject on account of the Administrator's business activities. The period of limitation is determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years).

4. RECIPIENTS OF DATA COLLECTED THROUGH THE WEBSITE

- 4.1. For the purposes of proper functioning of the Website, including execution of concluded Sales Agreements, it is necessary for the Administrator to use the services of external entities (such as e.g., software provider or payment processor). The Administrator only uses the services of such processors that provide appropriate safeguards to implement appropriate technical and organizational measures so that the processing meets the requirements of the GDPR and protects the rights of data subjects.

- 4.2.** The transfer of data by the Administrator does not take place in every case and not to all recipients or categories of recipients indicated in the Privacy Policy - the Administrator transfers data only if it is necessary for the realization of a given purpose of personal data processing and only to the extent necessary for its realization.
- 4.3.** The Administrator may transfer personal data to a third country (i.e., outside the European Economic Area), whereby the Administrator ensures that in such a case it is transferred to a country ensuring an adequate level of protection - in accordance with the GDPR, and the data subject is able to obtain a copy of their data. The Administrator transfers the collected personal data only in the case and to the extent necessary to realize the given purpose of the data processing in accordance with this Privacy Policy. Personal data may be transferred outside the European Economic Area to, among others:
- 4.3.1. Google LLC with headquarters in Mountain View, United States (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), in connection with the use of the e-mail system and the tools included in Google Workspace (formerly G Suite and Google Apps for Work), for statistical and administrative purposes and in connection with the use of the Google reCAPTCHA mechanism for security purposes;
- 4.3.2. Google Ireland Limited with registered office in Dublin, Ireland (Gordon House, Barrow Street, Dublin 4, Ireland), in relation to the use of personal data processing services offered by this entity, aimed at ensuring the provision of the services by the Administrator offered within the scope of the Website;
- 4.3.3. The Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA - provider of the Mailchimp service that enables the Administrator to send messages.
- 4.4.** Personal Data of the Service Recipients may be transferred to the following recipients or categories of recipients:
- 4.4.1. service providers supplying the Administrator with technical, IT and organisational solutions (in particular, providers of computer software for running the Website, e-mail and hosting providers, as well as providers of software for running the webinar and providing technical assistance to the Administrator) - the Administrator makes the collected personal data available to the chosen provider acting on their behalf only in the case and to the extent necessary for the accomplishment of a given purpose of data processing in accordance with this point of the Privacy Policy;
- 4.4.2. providers of accounting, legal and advisory services providing the Administrator with accounting, legal or advisory support (in particular an accounting office, a law firm or a debt collection agency) - the Administrator makes the collected personal data available to the chosen provider acting on their behalf only in the case and to the extent necessary to realize the given purpose of data processing in accordance with this point of the Privacy Policy;
- 4.4.3. providers of social plug-ins, scripts and other similar tools placed on the Website and enabling the Visitor's browser to retrieve content from the providers of the aforementioned plug-ins (e.g., logging in with social network login details) and to transfer the Visitor's personal data to those providers for that purpose, including: Facebook Ireland Ltd. - The Administrator uses Facebook social plug-ins on the Website (e.g., Like button, Share or login with Facebook login data) and therefore collects and discloses the personal data of the Service Recipients using the Website to Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) to the extent and in accordance with the privacy policy available here: <https://www.facebook.com/about/privacy/> (this data includes information about your activities on the Website - including information about your device, sites visited, purchases made, ads displayed and how you use the services - regardless of whether the Service Recipients a Facebook account and are logged into Facebook).

5. PROFILING ON THE WEBSITE

- 5.1.** The GDPR imposes an obligation on the Administrator to provide information on automated decision-making, including profiling as referred to in Article 22(1) and (4) of the GDPR, and, at least in these instances, relevant information on the modalities of such decision-making, as well as on the significance and the envisaged consequences of such processing for the data subject. With this in mind, the Administrator provides in this section of the Privacy Policy information on possible profiling.
- 5.2.** Administrator can use profiling on the Website for direct marketing purposes, but decisions made by the Administrator on such basis do not affect ability to use or refuse ability to use Electronic Services on the Website. The effect of using profiling on the Website may be e.g., displaying of customized content within the Website.
- 5.3.** Profiling on the Website consists in automatic analysis or prediction of a given person's behaviour on the Website, e.g., through browsing a particular page on the Website, or through analysis of the previous history of browsing on the Website. The condition of such profiling is possession by the Administrator of the given person's personal data.

- 5.4. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, and which produces legal effects or significantly affects the data subject in a similar manner.

6. RIGHTS OF THE DATA SUBJECT

- 6.1. **Right of access, correction, limitation, deletion or transfer** - the data subject has the right to demand from the Administrator access to their personal data, their correction, deletion ("right to be forgotten") or restriction of processing and has the right to object to processing, as well as the right to transfer their data. Detailed conditions for exercising the rights indicated above are indicated in Articles 15-21 of the GDPR.
- 6.2. **Right to withdraw consent at any time** - the person whose data is processed by the Administrator on the basis of an expressed consent (under Article 6(1)(a) or Article 9(2)(a) of the GDPR), has the right to withdraw the consent at any time without affecting the legality of the processing performed on the basis of the consent before its withdrawal.
- 6.3. **Right to lodge a complaint to the supervisory authority** - the person whose data is processed by the Administrator has the right to lodge a complaint to the supervisory authority in the manner and according to the procedure set out in the provisions of the GDPR and Polish law, in particular the Act on Personal Data Protection. The supervisory authority in Poland is the President of the Personal Data Protection Office.
- 6.4. **Right to object** - the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them based on Article 6(1)(e) (public interest or tasks) or (f) (legitimate interests of the Administrator), including profiling under those provisions. In that case, the Administrator is no longer permitted to process such personal data unless the Administrator demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, pursuing or defence of claims.
- 6.5. **Right to object to direct marketing** - where personal data is processed for the purposes of direct marketing, the data subject has the right to object at any time to processing of personal data concerning them for such marketing, including profiling, to the extent to which the processing is connected to such direct marketing.
- 6.6. In order to exercise the rights referred to in this section of the Privacy Policy, one may contact the Administrator by sending a relevant message in writing or by e-mail to the Administrator's address indicated at the beginning of the Privacy Policy or by using the contact form available on the Website.

7. WEBSITE COOKIES, USAGE DATA AND ANALYTICS

- 7.1. Cookies are small blocks of information in the form of text files sent by a server and stored on the website visitor's side (e.g., on the hard drive of your computer, laptop or smartphone memory card - depending on the device used by the Website visitors). Detailed information concerning Cookies as well as the history of their creation can be found, among others, here: https://pl.wikipedia.org/wiki/HTTP_cookie
- 7.2. Cookies that may be sent by the Website can be divided into different types, according to the following criteria:

Due to their provider:	Due to their storage period on the device of the person visiting the Website:	Due to the purpose of their use:
1) their own (created by the Administrator's Website) and 2) owned by third parties (other than the Administrator)	1) session files (stored until the time of logging out of the Website or switching off the web browser) and 2) permanent (stored for a specified time, defined by the parameters of each file or until manual removal)	1) necessary (enabling proper functioning of the Website, 2) functional/preferential (enabling adjustment of the Website to the preferences of the person visiting the Website), 3) analytical and efficiency (gathering information about the way of using the Website, 4) marketing, advertising and social networking (gathering information about the person visiting the

		Website in order to display personalized advertising to that person and to conduct other marketing activities, including marketing on external websites such as social networking sites
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7.3. The Administrator may process the data in Cookies when visitors use the Website for the following specific purposes:

Purposes of using cookies on the Administrator's website	identification of Website Recipients as logged in to the Website and showing that they are logged in (essential cookies)
	storing data from completed forms, surveys or login data to the Website (essential and/or functional/preferential cookies)
	adapting the content of the Website to the individual preferences of the Service Recipient (e.g., in terms of colours, font size, page layout) and optimising the use of the Website pages (functional/preference cookies)
	keeping anonymous statistics showing how the Website is used (statistical cookies)
	remarketing, i.e., studying the behavioural characteristics of the Website visitors by analysing their actions anonymously (e.g., repeated visits to specific pages, keywords, etc.) in order to create their profile and provide them with advertisements tailored to their predicted interests, also when they visit other websites in the advertising network of Google Ireland Ltd. and Facebook Ireland Ltd. (marketing, advertising and social networking cookies)

7.4. Checking the most popular web browsers which cookies (including the duration of cookies and their provider) are sent at a given moment by the Website is possible in the following way:

In the Chrome browser: (1) in the address bar, click on the lock icon on the left, and (2) go to the "Cookies" tab.	In the Firefox browser: (1) in the address bar, click on the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click the box for "Site-to-Site Tracking Cookies," "Social Media Tracking Elements," or "Content with Tracking Elements"	In the Internet Explorer browser: (1) click the "Tools" menu, (2) go to the "Internet Options" tab, (3) go to the "General" tab, (4) go to the "Settings" tab, (5) click the "View Files" box
In the Opera browser: (1) in the address bar, click on the padlock icon on the left, (2) go to the "Cookies" tab.	In the Safari browser: (1) click the "Preferences" menu, (2) go to the "Privacy" tab, (3) click in the "Manage site data" box	Regardless of the browser, using the tools available on the site, for example: https://www.cookie-matrix.com/ or: https://www.cookie-checker.com/

- 7.5. By default, most web browsers available on the market accept the storage of cookies. One can determine the conditions for the use of cookies through their web browser's settings. This means that one can, for example, partially restrict (e.g., temporarily) or completely disable the storage of cookies - in the latter case, however, this may affect some of the functionality of the Website (for example, it may not be possible to proceed with the Order through the Order Form due to not being able to store the Products in the basket during the subsequent steps of submitting the Order).
- 7.6. The Internet browser settings regarding cookies are important from the point of view of agreeing to the use of cookies by the Website - in accordance with the regulations, such agreement may also be expressed through the settings of the Internet browser. Detailed information on changing the settings for Cookies and on how to delete them on your own in the most popular web browsers is available in the help section of the web browser and on the following pages (just click on the link):
- [in the Chrome browser](#)
 - [in the Firefox browser](#)
 - [in the Internet Explorer browser](#)
 - [in the Opera browser](#)
 - [in the Safari browser](#)
 - [in the Microsoft Edge browser](#)
- 7.7. The Administrator can use Google Analytics, Universal Analytics services provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Administrator keep statistics and analyse traffic on the Website. The data collected is processed by the above services to generate statistics that help administer the Website and analyse Website traffic. The data is of collective nature. The Administrator, while using the above services on the Website, collects such data as: the source and means of attracting the visitors to the Website as well as their behaviour on the Website, information on the devices and browsers from which they visit the Website, IP and domain, geographical data and demographic data (age, gender) and interests.
- 7.8. It is possible to easily block the disclosure of information to Google Analytics about their activity on the Website - for this purpose, for example, one can install a browser add-on provided by Google Ireland Ltd. available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>.
- 7.9. The Administrator may use the Facebook Pixel service provided by Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) on the Website. This service helps the Administrator to measure the effectiveness of advertisements and find out what actions are taken by the Website visitors, and to display tailored advertisements to those visitors. For detailed information on how Facebook Pixel works, visit the following web address:
- https://www.facebook.com/business/help/742478679120153?helpref=page_content.
- 7.10. Managing the performance of the Facebook Pixel is possible through the ad settings in the user's Facebook.com account: https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen.

8. FINAL PROVISIONS

- 8.1. The Website may contain links to other websites. The Administrator encourages everyone to become familiar with the Privacy Policy set forth therein. This Privacy Policy applies only to the Administrator's Website.