

PRIVACY POLICY

Controller.

This document ("**Privacy Policy**") describes how More is More spółka z ograniczoną odpowiedzialnością office in Warsaw at 34/4 Śmiała street, entered in the Business Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14 Commercial Division of the National Court Register under number 0001177230 ("**We/Controller**") processes your personal data as our Client ("**Client**") or a user of the website <https://moreismore.pl> ("**Website**").

When you visit our Platform or become our Client, we may obtain and process certain information about you ("**Data**"). Your Data is processed in accordance with applicable law and with the highest standards of privacy and security. First and foremost, we apply 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) ("**GDPR**"). We also use secure technical and organizational measures to protect all Data processed by us from loss, destruction or unauthorized access by third parties.

Source of the collected Data

We may obtain Data directly from you or our Client in connection with negotiating, concluding, executing or archiving a contract concluded with us. We may also process Data that we have obtained from publicly available sources, e.g. the National Court Register, the Central Register and Information of Business Activity, social networks, websites of business entities. The data that we obtain depending on the purposes of their processing may be:

- basic identification data (name and surname, name),
- contact details (phone number, e-mail, mailing address),
- data on identification numbers (series and number of ID card, PESEL, NIP).

Data we obtain automatically

Our Platform collects certain Data automatically when you use it. We may obtain information through automated means, such as browser cookies, pixels, web server logs, web beacons and other technologies. These technologies, among other things, help us (1) remember your information so you don't have to re-enter it, (2) track and understand how you use and interact with the Platform, (3) tailor the Platform to your preferences, (4) manage and measure the usability of the Platform, (5) understand the effectiveness of our communications, and (6) otherwise improve our services.

The information we collect by automated means includes:

- Data about your device, including MAC address, IP address, log information, device model, hardware model, IMEI number, serial number, subscription information, device settings, connections to other devices, mobile network operator, browser characteristics, application usage information, sales code, access code, current software version, MNC, subscription information, and random, non-persistent and re-settable device identifiers, such as your Personalized Service Identifier (or PSID), and advertising identifiers, including your Google Ads ID;
- Data about your use of the Platform, including Clickstream Data; your interactions with the Platform (such as websites visited, search terms used, and applications and features used); the

pages that led or directed you to the Platform; the dates and times you use the Platform; and your use of third-party websites, applications, and features that are linked to our Services.

- Data about Your use of third-party websites, applications and features that are linked to Our Services.

Purposes, legal basis and period of Data processing

We may process your Data for the following purposes, on the basis and for the periods indicated in the table below:

- (a) **Provision of services.** We use your Data to provide services to you, and to receive, make, or contact you about payments related to them. The legal basis for the processing is the necessity for the performance of a contract to which you are a party (Article 6(1)(b) of the GDPR). The retention period for such data processing lasts until the end of the contract between us.
- (b) **Providing services to our Client.** We use your Data to enter or perform a contract between us and the entity with which you are affiliated or represent (e.g. a Client, contractor or other entity contacting us). The legal basis for the processing is the legitimate interest of the Controller in the form of performance of concluded contracts (Article 6(1)(f) of the GDPR). The retention period for such data processing lasts until the contract concluded with our Client is performed, terminated or expires.
- (c) **Improving our services.** We use your Data to monitor, analyze and improve the quality of our services and ensuring system security. The legal basis for the processing is the legitimate interest of the Controller to optimize the services provided (Article 6(1)(f) of the GDPR). The retention period for such data processing lasts until the objection to the processing is raised, in any case no longer than 5 years.
- (d) **Recruitment.** We process your Data sent to us as part of the recruitment processes. The legal basis for the processing is: (a) in the case of information specified in the Labour Code, Article 6(1)(c) of the GDPR (compliance with a legal obligation to which the controller is subject); (b) Article 6(1)(b) of the GDPR (performance of a contract) – the processing is necessary to enter into a contract with you; and (c) we process information not related to your qualifications or professional achievements (e.g. photo, interests) on the basis of Article 6(1)(a) of the GDPR (consent); and (d) we process the information that you have voluntarily provided to us that is special category data on the basis of Article 9(2)(a) of the GDPR (consent). We process the Data provided for the purpose of recruitment for the position indicated by us in the job advertisement in the period from the moment of receipt of the application to the end of the recruitment process, but no longer than for a year from its receipt. If you have consented to the processing of your Data as part of future recruitment processes, we will process your Data until you withdraw this consent, but no longer than within one year from the date of its consent. We process the Data processed based on consent until it is withdrawn or when the processing of other Data of a given person is terminated.
- (e) **Handling your requests.** We will process your Data to respond to your requests or complaints. The legal basis for the processing is the legitimate interest of the controller (Article 6(1)(f) of the GDPR). This legitimate interest is to enable us to properly handle your complaint. The retention period for such processing lasts until the statute of limitations for claims arising from your requests or complaints.
- (f) **Compliance with obligations resulting from the law,** industry norms and standards and internal regulations of the Controller, including the Privacy Policy. In some cases, we collect and

use your Data to comply with legal regulations, for example, Payment Data is processed to comply with tax and accounting obligations. The legal basis for the processing of data is the necessity to comply with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR). The retention period of such data lasts until the relevant provisions of law authorize us to process them.

- (g) **Contact/Marketing.** We use your data to communicate with you through various channels, to keep you informed about our news, promotions and other interesting events related to our services. The legal basis for data processing is the legitimate interest of Controller (Article 6(1)(f) of the GDPR) but it's directly connected to your consent granted to us based on Article 398 of the Electronic Communications Law. The retention period for such data processing until the consent is withdrawn, in any case no longer than 3 years.
- (h) **Exercise or defense of legal claims.** We process your Data to exercise or defend our legal claims or interests. The legal basis for such processing is the legitimate interest of the Controller (Article 6(1)(f) of the GDPR). This legitimate interest is the exercise or defense of legal claims that we may have or that may be asserted against us. The data is stored for the duration of the legitimate interest pursued by us, but no longer than for the period of limitation of claims (the basic limitation period for claims is six years).
- (i) **Website analytics and personalization.** We use your Data to personalize content and to analyze the Website and web traffic. We use cookies for this purpose. The legal basis for the processing is your consent (Article 6(1)(a) of the GDPR). The retention period for such data processing until the consent is withdrawn, in any case no longer than 2 years.

Voluntary Provision of Data

Providing Data is voluntary. However, without receiving the necessary Data, we may not be able to carry out some of the activities commissioned by you or our Client - their submission is therefore a condition for entering into a contract with us.

Recipients of Data

In some situations, we may need to share your Data with third parties, such as:

- **Third party service providers** - we hire other companies and individuals to perform tasks on our behalf. Examples include fulfilling orders for products or services, providing marketing support, providing legal and accounting services. Such third-party service providers have access to the Data to the extent necessary to perform their functions but may not use it for other purposes. In addition, they must process the Data in accordance with the provisions of the Data Processing Agreements and applicable Data Protection Laws.
- **Public authorities** - in connection with the proceedings conducted by them under the relevant provisions of law.

Transfer of data to countries outside the EEA

We do not transfer and do not plan to transfer Data originating in the European Economic Area to countries outside the European Economic Area.

If, in connection with the provision of our services, it is necessary to transfer the Data to service providers or other third parties outside the European Economic Area, we will only transfer such data to: (a) entities located in countries where the EU Commission has found an adequate level of protection within the meaning of Article 45(3) of the GDPR; (b) in the absence of such a decision (e.g. for the USA), the legal

POLITYKA OCHRONY DANYCH OSOBOWYCH
MORE IS MORE SP. Z O.O.

basis for the transfer of the Data is a contract based on standard contractual clauses constituting a set of principles adopted by the European Commission, which, in accordance with Article 46 of the GDPR, ensure the security of the transfer of the Data; (c) on the basis of your consent (Article 49(1)(a) of the GDPR). You will then be informed by us of such data transfer.

Your rights

In connection to processing of your Data you are entitled to:

- The right to request us to access, rectify or delete your Data ("right to be forgotten");
- The right to object to the processing of your Data for direct marketing purposes, because of which we will stop processing your Data for such purposes;
- The right to object on grounds relating to your situation where we process your Data on the basis of legitimate interest. However, we will continue to process your Data to the extent necessary, if there is a legitimate reason;
- The right to transfer or restrict the processing of Data processed in connection with the performance of a contract or processed based on your consent;
- Where processing is based on your consent, you have the right to withdraw that consent at any time. However, withdrawal of consent does not affect the lawfulness of our processing of your Data that we performed based on your consent before its withdrawal.

You can find more information about your rights in the context of your personal data on this website: <https://uodo.gov.pl/pl/383/579>.

If you believe that our processing of your Data violates the law, you may file a complaint with the President of the Office for Personal Data Protection.

Automated Decision Making and Profiling

Your Data is not subject to automated processing, in particular profiling.

Contact with us

You can contact Us by writing an email to: hello@moreismore.pl. Our Team will assist you if you have any questions or comments about the protection of your data or if you would like to exercise your rights under the GDPR. When contacting Us, please remember to provide us with your contact details and your preferred method of contact. This will allow us to respond to your questions and requests more efficiently.

Current version of Privacy Policy

This Privacy Policy is an up-to-date notice of our processing of your Data. Its content may change in case we change the way we process your Data.