

**Attachment no. 1  
to the Terms and Conditions of Unit80.pl portal**

**PRIVACY POLICY OF  
UNIT80.PL PORTAL**

**Privacy policy**

Dear user! We regard Yours safety as extremely important and that is why we put our effort to protect Your personal data.

This Privacy Policy is an integral part of the Terms and Conditions of Unit80.com portal and is available under the web address: [https://unit80.com/content/files/Privacy\\_Policy\\_Unit80.pdf](https://unit80.com/content/files/Privacy_Policy_Unit80.pdf). The terms written with capital letters are meant to be understood in a way defined in the Terms and Conditions. The acceptance of the Terms and Conditions means acceptance of the Privacy Policy. Privacy Policy determines the rules of processing and protection of personal data of Users and rules related to usage of so called *cookie* files.

**I. The Administrator**

1. The Administrator of personal data of Users (hereinafter called 'Data') is Million Frames Sp. z o.o., with headquarters at (00-105), ul. Twarda 18, registered in the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register under the KRS (national court register) number: 0000600251.
2. Access to the personal data of our Users is granted only to authorized persons.

**II. Processing purpose**

1. The Data is processed in order to execute the License Agreement concluded between the User and the Administrator through the Portal, what includes contacting the User, keeping accounts and verification of authenticity of the Data provided by Users in the Form.
2. Besides purposes listed above, with a consent of the User, the Data will be also used to send responses from the Administrator to Users, including messages sent by the Administrator to an e-mail address provided by the User.
3. The Administrator collects and processes only Data of Users, which are at the same time Licensees or of those who provided him with the data with a purpose other than related to functioning of the portal.
4. The Administrator collects and processes User Data only for the following purposes:
  - a) in order to conclude a License Agreement based on an interest of the User in Administrator's offer (based on art. 6 section 1 point b of RODO);
  - b) in order to execute a concluded License Agreement and based on this concluded License Agreement (based on art. 6 section 1 point b of RODO);
  - c) in order to undertake activities on a request of a person, to whom the data is related to, in connection to usage of the Portal by this person (based on art. 6 section 1 point b of RODO);
  - d) for archival (evidence) purposes being a realization of a legally justified interest of the Administrator, to secure information in a case of legal requirement to provide facts (based on art. 6 section 1 point f of RODO);
  - e) for purposes of possible establishment, pursuit or defense against claims, being a realization of legally justified interest of the Administrator (based on art. 6 section 1 point f of RODO).
5. User has a right to access, update and erase his / her Data.

6. **Data recipients.** Data of the Licensee may be revealed to entities who keep the accounts of the Administrator, who handle financial transactions and process them based on concluded License Agreement and authors of the Materials, in case of violating copyrights or personal rights by a Licensee and also in case when these rights are threatened or suspected to be violated.

### III. Basis for processing Data

1. Data processing is based on a consent expressed by a User through checking relevant fields in the Form, and also statutory authorization to process data which is necessary to realize and settle accounts of services provided by the Administrator.
2. Actions of the Administrator which consist in processing of User Data will be corresponding a scope of consents expressed by the User.
3. The consent has a voluntary nature. Data will be processed in accordance with the conditions identified in the Privacy Policy, the Terms and Conditions and also the Act on Protection of Personal Data, Act on Providing Services Through Electronic Means and European Parliament and Council Regulation (EU) 2016/679 as of 27 April 2016 on protection of natural persons in relation to data processing and on free flow of such data and the repeal of the directive 95/46/WE (RODO).
4. Personal data is processed only for purposes related to realization of the License Agreement and to undertake necessary actions before concluding the License Agreement or on a request of the User in relation to functioning of the Portal.
5. Providing personal data is voluntary, however a failure to provide the data will cause the conclusion and realization of the License Agreement to be impossible.
6. Personal data will be stored for no longer than it is necessary, this is, for a period starting from conclusion of the License Agreement to the date of its termination or expiry and for a period of time in which any claims related to the License Agreement or replies to inquiries of the User in relation to the usage of Portal, might occur.
7. The Administrator is not going to deliver Data to third-party countries and to international organizations.
8. Based on Data, the Administrator will not take automated decisions in relation to Users, including decisions which will be a result of profiling.

### IV. User rights

1. Providing data has a voluntary nature, however, it is necessary to conclude and execute the License Agreement and to answer messages sent by the User to the Administrator.
2. User has a right to access the Data content and to modify and update it. The Administrator provides Users with a possibility to erase Data. However, the Administrator has a right to refuse to erase the Data if the User did not pay the Administrator Licensee Fee or he / she violated the provisions of the Terms and Conditions or obligatory legal regulations and keeping Data is necessary to explain the circumstances and to establish User's liability.
3. The Administrator informs the User, that pursuant to RODO, the User has a right to:
  - a) access his / her data and to receive a copy of his / her Data;
  - b) correct (modify) his / her Data;
  - c) to stop or limit Data processing;
  - d) to raise objections against Data processing;
  - e) to transfer Data;
  - f) to file a complaint to a supervisory body.
4. User declares that he was informed, that the Administrator administers Data, and that he has a right to access the content of Data provided by the User and also has a right to modify and correct this Data.
5. The User is **entitled**, at any given moment, to **withdraw his consent** given in order to

process his / her Data, however, the consent withdrawal does not make the processing of Data, that was done based on consent expressed before its withdrawal, to be not in accordance with the law.

6. **Right to raise objections.** The User, at any given moment, is entitled to raise objections against processing of his / her Data, based on legally justified interest, which is set out in point II, section 4, d) and e) of the Privacy Policy. The Administrator will stop processing User personal data for these purposes, unless the Administrator proves, that in relation to personal data of the User, there are legally justified grounds, which prevail over interests, rights and freedom of the User, or personal data of the User will be necessary for the Administrator to establish, pursue or defend possible claims.

#### **V. Information about technical measures preventing acquisition and modification of personal data, transferred through electronic means, by unauthorized persons**

The Data is protected in accordance with obligatory legal regulations with usage of appropriate technical safety measures which provide its safety. The Data sent in the Form to the Portal is encrypted.

#### **VI. Information on *cookie* files usage**

1. Many internet websites store in the browser's directory (e.g. Firefox, Internet Explorer, Chrome) on Your user account, instruments that You use to connect to the Internet, they are, so called, *cookie* files. The portal also uses this opportunity to remember Your individual settings of some of the Portal functions, which would have been unavailable without active function of using cookie files in your browser.
2. Cookie files contain information technology data, especially text files, which are stored on Portal user's device and are used by browsers during usage of the Portal.
3. Software intended to be used to browse websites (internet browser), by default, allows storage of cookie files on User's device. Portal Users may, at any given moment, change settings in relation to cookie files. Those settings may be changed, especially in a way, that blocks automatic handling of cookie files by internet browser, or in a way that the internet browser asks the user every time about saving a cookie file on a Portal User's device. Detailed information about possibilities and ways of handling cookie files is available in the software settings (internet browser's)
4. User, at any given moment, may change or deactivate handling of cookie files for a specific internet website, or for all types of connection from his / her browser.
5. Deactivating handling of cookie files may cause difficulties in usage of some services as a part of our Portal.
6. Cookie files in our Portal are, in particular, used to:
  - a) preparing statistics, which e.g. support website positioning, making it easier to access required information by a user;
  - b) change of an outlook or version of the Portal;
  - c) storing session data (expires after the session is finished);
  - d) providing access to some of the parts of the Portal, e.g. those protected with login system;
  - e) remembering information, which was selected, for example such as the chosen website language;
  - f) adjusting information and promotional contents, providing users with advertisement content which is suited to their interests;
  - g) adjusting content of the Portal to preferences of a user and optimization of internet website usage;
  - h) control of display of pop-up messages, after a certain time interval;

- i) managing cache in order to optimize the time of displaying the website for Users
7. Within the scope of the Portal, the Administrator may use following types of cookie files:
- a) necessary cookie files - which enable to use services within the scope of the Portal, e.g. authentication cookie files used for services requiring authentication within the scope of the Portal,
  - b) cookie files used for providing safety, - e.g. used to detect violations in scope of authentication in the Portal,
  - c) cookie files which enable to collect information about the way of using internet websites of the Portal.
  - d) functional cookie files – enabling saving some of the settings of the user and personalizing user’s interface, e.g. selected language or region the user comes from, font size, appearance of the website etc.,
  - e) advertisement cookie files – enabling to provide users with advertisement content which is more suitable to their interests.

## **VII. Data storage period**

Licensee data, acquired as a part of the License Agreement conclusion will be processed for a period which may reveal claims related to this Agreement, this is, for a period of time which constitutes an aggregate of the period for which the License is granted, based on license Agreement, and period of 10 years since the end of the year in which the License Agreement expired. 10 years is actually the longest possible period of claims’ prescription. Data of the remaining Users will be only processed for period necessary for the Administrator to send replies to messages.

## **VIII. Remaining provisions**

1. Data may be shared with authorized entities, pursuant to legal regulations, including competent justice system authorities.
2. In case when the Administrator receives message about the User who violates the Terms and Conditions of the Portal, the Privacy Policy or obligatory laws, the Administrator may process User’s Data in a scope necessary to establish liability of the User, provided that he will record the fact of acquiring and content of these messages for evidence purposes.