

PRIVACY POLICY OF THE SOLVEREDU.COM ONLINE APPLICATION

§ 1

GENERAL PROVISIONS

1. The administrator of personal data collected through the Application is Solveredu sp. z o.o., with its registered office in Wrocław, ul. Zdrowa 22/7a, 53-511 Wrocław, entered in the National Court Register under number KRS 0001157555, NIP: 8971949662, REGON: 541013535, email address: solveredu@solveredu.com, phone number: +48 508 203 666, hereinafter referred to as the "Administrator" and also acting as the "Service Provider".
2. Personal data collected by the Data Controller via the Application are processed in accordance with the 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/WE (General Data Protection Regulation), hereinafter referred to as the **GDPR**.
3. Capitalised terms used in this Privacy Policy shall have the meaning set forth in the "Definitions" section of the Application Terms and Conditions.

§ 2

TYPE OF PERSONAL DATA PROCESSED, PURPOSE AND SCOPE OF DATA COLLECTION

1. **PURPOSE AND LEGAL BASIS OF PROCESSING.** The Data Controller processes the personal data of the Application Users in the following cases:
 - 1.1. Account registration for the purpose of creating and managing an individual account, on the basis of Article 6(1)(b) GDPR (performance of a contract for the provision of services by electronic means in accordance with the Application Terms and Conditions),
 - 1.2. Placing an Order in the Application for the purpose of performing a Contract for the delivery of Digital Content on the basis of Article 6(1)(b) GDPR (performance of a contract)
 - 1.3. Subscribing to the Newsletter for the purpose of sending commercial information by electronic means. Personal data is processed after obtaining separate consent, on the basis of Article 6(1)(a) GDPR,
 - 1.4. Using the Calculation Form by the User for the purpose of performing a Contract for the delivery of Digital Services on the basis of Article 6(1)(b) GDPR (performance of a contract).
2. **TYPES OF PERSONAL DATA PROCESSED.** The User provides, in the case of:
 - 2.1. **Account:** login, e-mail address,
 - 2.2. **Order:** name and surname, NIP, e-mail address, telephone number
 - 2.3. **Newsletter:** e-mail address,
 - 2.4. **Calculation Form:** name and surname, e-mail address.
3. Personal data submitted by Users are retained by the Data Controller for the following retention periods:
 - 3.1. If the lawful basis is agreement performance: personal data are stored for as long as necessary for the performance of an agreement, and thereafter until the expiry of any statutory period of prescription or limitation. Unless a specific regulation provides otherwise the limitation period is six years, whereas for claims concerning periodical performances and claims connected with conducting business activity – three years.
 - 3.2. If the lawful basis is consent: personal data are stored until withdrawal of consent, and thereafter until the expiry of any statutory period of prescription or limitation for claims that may be raised by the Data Controller or that may be brought against the Data Controller. Unless a specific regulation provides otherwise the limitation period is six years, whereas for claims concerning periodical performances and claims connected with conducting business activity – three years.

4. The Data Controller may collect additional User information, including, in particular: a User's computer IP address, the IP address of the internet provider, domain name, browser type, duration of a visit, operating system.
5. If the Data Subject has given a separate consent to such processing Article 6 (1) (a) GDPR their personal data may be processed for the purpose of sending electronic marketing messages or for direct marketing via telephone – in accordance with Article 10 section 2 of the Act on the Provision of Electronic Services of 18 July 2002 or Article 172, section 1 of the Telecommunications Law Act of 16 July 2004, including profiled marketing communications if the Data Subject has consented to receive such communications.
6. Navigation Users may also collect navigation data, including information about links and links in which they decide to click or other activities undertaken in the Application. The legal basis for this type of activity is the Data Controller's legitimate interest Article 6 (1) (f) GDPR, consisting in facilitating the use of electronic services and improving the functionality of these services.
7. Submitting personal data to the Application is voluntary.
8. The Data Controller shall take all reasonable steps to protect the interests of data subjects and ensure that all data is:
 - 8.1. lawfully processed,
 - 8.2. obtained only for specified, lawful purposes, and not further processed in any manner incompatible with those purposes,
 - 8.3. factually correct, adequate and relevant in relation to the purposes for which it is processed; stored in a form that permits identification of the data subject, for no longer than is necessary for those purposes.

§ 3

THIRD PARTY ACCESS TO PERSONAL INFORMATION

1. The personal data of the Customers are provided to service providers used by the Data Controller when running the Application, in particular to:
 - 1.1. payment system providers,
 - 1.2. accounting office,
 - 1.3. hosting providers,
 - 1.4. software providers that enable business operations,
 - 1.5. software provider needed to run an online Application.
2. The service providers referred to in point 1 of this paragraph to which personal data are transferred, depending on contractual arrangements and circumstances, or are subject to the Data Controller's instructions as to the purposes and methods of processing this data (processors) or independently define the purposes and methods their processing (administrators).
3. The personal data of the Customers are stored only in the European Economic Area (EEA), subject to §5 point 5 of the Privacy Policy.

§ 4

RIGHT OF CONTROLL, ACCESS AND RECTIFICATION

1. Every User has a right to access and/or rectify his personal data as well as the right to erasure, the right to restrict processing, the right to data portability, the right to object to processing and the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
2. Legal basis for data subjects' rights:
 - a) **Access to personal data** – Article 15 of the GDPR
 - b) **Rectification of personal data** – Article 16 of the GDPR,
 - c) **Erasure of personal data (right to be forgotten)** - Article 17 of the GDPR,
 - d) **Restriction of data processing** – Article 18 of the GDPR,
 - e) **Data portability** – Article 20 of the GDPR,
 - f) **Objection to processing** – Article 21 of the GDPR,
 - g) **Withdrawal of consent to processing** – Article 7 (3) of the GDPR.

3. The User may exercise his rights under point 2 by sending an email message to: **solveredu@solveredu.com**
4. If any request is received in relation to a data subject's rights, the Data Controller must comply with or refuse to act on a User's request without delay but not later than within a month of receiving the request. However, if a request is complex or if the Data Controller receives more requests, the Data Controller may extend the time to respond by a further two months. If this is the case the Data Controller shall inform the User within one month of receiving their request and explain why the extension is necessary.
5. If the data subject considers that, in connection with personal data relating to him or her, there is an infringement of the GDPR, the data subject may make a complaint to the President of the Personal Data Protection Office.

§ 5 COOKIE POLICY

1. The Application uses cookies.
2. Cookies are essential for the provision of electronic services via the Application. Cookies, contain information that is necessary for the proper functioning of the Application and for the statistical analysis of the Application traffic.
3. The Application uses two types of cookies: "session" cookies and "persistent" cookies.
 - a) "Session" cookies are temporary files which are stored on the User's end-device until they log out (leave the Application).
 - b) "Persistent" cookies remain stored on the User's device until deleted manually or automatically after a set period of time.
4. The Data Controller uses their own cookies to provide information on how individual Users interact with the Application. These files collect information about how Users use the Application, what type of the Application referred the User to the Application, the frequency of visits and the time of each visit. This information does not register the Users' personal data and is used solely for statistical analysis of the Application traffic.
5. The Data Controller uses third party cookies for the purpose of collecting general and anonymous static data by means of Google Analytics, a web analysis tool (Data controller for third party cookies: Google Inc. based in USA).
6. "Cookies" files can also be used by advertising networks, in particular the Google network, to display advertisements tailored to the way the User uses the Store. For this purpose, they may store information about the User's navigation path or the time spent on a given page.
7. The User has the right to decide on the access of "cookies" files to his or her computer by changing the settings in his or her browser window. Detailed information on the possibility and methods of handling "cookies" files is also available in the software (web browser) settings.

§ 6 ADDITIONAL SERVICES RELATED TO THE USER'S ACTIVITY IN THE APPLICATION

1. The Application uses so-called social plugins ("plugins") of social networking sites. By displaying the Application containing such a plug-in, the User's browser will establish a direct connection with the servers Google.
2. The content of the plug-in is forwarded by the given service provider directly to the User's browser and integrated with the Application. Thanks to this integration, service providers receive information that the User's browser has displayed the Application, even if the User does not have a profile with the given service provider or is not currently logged in to him. Such information (together with the User's IP address) is sent by the browser directly to the server of the given service provider (some servers are located in the USA) and stored there.

3. If the User logs in to one of the above social networking sites, the service provider will be able to directly assign the visit to the Application to the User's profile on the given social networking site.
4. If the User uses a given plug-in, e.g. by clicking on the "Like" button or the "Share" button, the relevant information will also be sent directly to the server of the given service provider and stored there.
5. The purpose and scope of data collection and their further processing and use by service providers, as well as the possibility of contact and the User's rights in this regard and the possibility of making settings that ensure the protection of the User's privacy are described in the privacy policy of service providers: <https://policies.google.com/privacy?hl=pl&gl=ZZ>.
6. If the User does not want social networking services to assign data collected during visits to Application directly to his profile on a given Application, he must log out of this Application before visiting Application. The User may also completely prevent the plugins from loading on the page by using the appropriate browser extensions, e.g. blocking scripts using "NoScript".
7. We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement.

§ 7

FINAL PROVISIONS

1. The Data Controller shall implement all necessary technical and organisational security measures to safeguard the data during processing ensuring a level of security appropriate to the nature of the data to be protected and, in particular, protect the data against unauthorised access, takeover, processing in violation of law, alteration, loss, damage or destruction.
2. The Service Provider shall take appropriate technical measures to safeguard the electronic personal data against unauthorised interception or modification.
3. In cases not provided for in this Privacy Policy the relevant provisions of the GDPR shall apply as well as applicable provisions of Polish law.