PRIVACY POLICY

This Privacy Policy complies with 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. The GDPR regulates the principles of personal data processing and applies uniformly in all countries of the European Union.

1. IDENTIFICATION OF THE PERSONAL DATA CONTROLLER

SZTOLDO.PL Spółka z ograniczoną odpowiedzialnością Spółka komandytowa,
ul. Własna 6, 75-377 Koszalin,
telephone number: +48 609 622 195,
email address: kontakt@kupbilecik.pl,
NIP: 6692543084, REGON: 369236917, KRS 0000713091,
registered with the District Court in Koszalin, 9th Commercial Division.

2. SCOPE OF DATA PROCESSING

In connection with the User's use of the Administrator's Service, data are collected to the extent necessary to provide the offered services, as well as information about the User's activity in the Service. Your personal data are collected and used with your consent and are processed in accordance with applicable law, in particular on the legal bases specified in Article 6(1) GDPR. Depending on the purpose of processing, in addition to your consent (Article 6(1)(a) GDPR), the legal basis for data processing may in particular be: the necessity of processing for the performance of a contract or in order to take steps prior to entering into a contract (Article 6(1)(b) GDPR), compliance with a legal obligation to which the Administrator is subject (Article 6(1)(c) GDPR), or the legitimate interest pursued by the Administrator or by a third party (Article 6(1)(f) GDPR).

3. PURPOSES OF PROCESSING YOUR PERSONAL DATA

3a. We collect, process and use your personal data for the following purposes:

- entering into and performing contracts;
- delivering newsletters/alerts;
- customer service;
- handling business partners;

- proper organisation and execution of events, including the disclosure of data to organisers or entities cooperating in ticket distribution to the extent necessary to execute the event and verify entitlement to use dedicated ticket pools.

3b. Provision of electronic services, for example for the purpose of processing orders for goods and services offered by us via the internet.

Your personal data will be processed on the basis of principles arising from law:

- **Article 6(1)(a) GDPR** – the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- **Article 6(1)(b) GDPR** – processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract;
- **Article 6(1)(c) GDPR** – processing is necessary for compliance with a legal obligation to which the controller is subject;
- **Article 6(1)(d) GDPR** – processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- **Article 6(1)(f) GDPR** – processing is necessary for the purposes of the legitimate interests pursued by the controller 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.

4. PROCESSING OF CUSTOMERS' PERSONAL DATA

a. Making contact

Information provided to us by you when contacting us by telephone, email or via a contact form will be stored by us on the basis of Article 6(1)(a) GDPR for the purpose of responding to your questions. The contact will be recorded in a register so that we can demonstrate, in accordance with legal requirements, that the contact took place. When completing the contact form, your consent will be obtained, and this Privacy Policy will be referred to in the form. Data collected in this way will be deleted by us without undue delay after the relevant conversation has ended and the matter under consideration has been finally resolved.

b. Registration

On our website, we enable you to register by providing personal data. These data are entered into a data form, sent to us and stored by us. Registration is carried out for the purpose of performing a contract or taking steps aimed at entering into a contract and is therefore based on Article 6(1)(b) GDPR. In order to enter into and perform contracts, we require contact details depending

on the specific case, for example: name and surname, delivery address, billing address, email address and information about the selected payment method. We also use your data to maintain our customer records, where only the most relevant data are stored. This is also done to prevent typographical errors (so-called “typos”) and to ensure that the ordered products are actually sent to you.

c. Purchase without registration

On our website, we also enable you to purchase without registration; it is sufficient to provide personal data once. These data are entered into a data form, sent to us and stored by us. Processing is carried out for the purpose of performing a contract or taking steps aimed at entering into a contract and is therefore based on Article 6(1)(b) GDPR. In order to enter into and perform contracts, we require contact details depending on the specific case, for example: name and surname, delivery address, billing address, email address and information about the selected payment method. We also use your data to maintain our customer records, where only the most relevant data are stored. This is also done to prevent typographical errors (so-called “typos”) and to ensure that the ordered products are actually sent to you.

d. Miscellaneous provisions

On the basis of Article 6(1)(c) and (f) GDPR, we use and store your personal data and, where necessary, technical information in order to prevent the misuse of data or other unlawful conduct on our website, or to investigate such cases, for example to ensure data security in the event of attacks on our IT systems. This may be done on the basis of orders issued by public authorities or courts, where required by law, as well as to protect our rights and interests and to enable us to defend ourselves in court.

5. ANALYTICAL FUNCTIONS USED

We use Google Analytics software, which enables us to analyse user activity and tailor marketing activities to users’ preferences. Google Analytics provides, among other things, information about the subpages visited by the user. On the basis of data collected by Google Analytics, we may automatically tailor website content to users. Google Analytics has its own privacy policy.

We also use **Microsoft Clarity** (provider: Microsoft Ireland Operations Ltd.), which shows us, in the form of session recordings and heatmaps, how users use the website (cursor movements, clicks, scrolling). This helps us detect errors and improve how the pages work. Content typed into form fields is masked in the browser and is not sent to Microsoft, and Clarity does not run in the customer, organiser, company, branch or partner panels. Clarity cookies are saved only after analytical consent is given (Article 6(1)(a) of the GDPR); without this consent Clarity does not save cookies and each page view receives a separate identifier. Recordings are kept for 30 days, and

selected recordings (marked as favourites or included in a random sample) for up to 9 months. Details are set out in the Cookie Policy.

6. Contact form

The Administrator provides the option of contacting it using electronic contact forms. Using the form requires the provision of personal data necessary to contact the User and respond to the enquiry. The User may also provide other data in order to facilitate contact or handling of the enquiry. Providing data marked as mandatory is required in order to accept and handle the enquiry, and failure to provide such data will make handling impossible. Providing other data is voluntary. Personal data are processed for the purpose of identifying the sender and handling the enquiry sent via the form made available. The legal basis for processing is the necessity of processing for the performance of a contract for the provision of a service (Article 6(1)(b) GDPR).

7. Newsletter / alerts

The Administrator provides a newsletter/alert service under the terms specified in the regulations to persons who have provided their email address or telephone number for this purpose. Providing data is required in order to provide the newsletter/alert service, and failure to provide such data will make it impossible to send it.

Personal data are processed:

for the purpose of providing the newsletter/alert dispatch service, including the sending of marketing content – the legal basis for processing is the User's consent to receive it (Article 6(1)(a) GDPR); for the purpose of the possible establishment, pursuit or defence of claims – the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) GDPR). The User may unsubscribe from the newsletter/alert at any time. The User may contact the Customer Service Department by telephone at **+48 609 622 195** between 8:00 a.m. and 4:00 p.m. or by sending an email to **kontakt@kupbilecik.pl**. The User may also unsubscribe by clicking "Unsubscribe" directly in the newsletter message received or, if the User has an account, through the online service.

8. Social media portals

The Administrator processes personal data of Users visiting the Administrator's profiles maintained on social media (Facebook, YouTube, Instagram, Twitter). These data are processed solely in connection with maintaining the profile, including for the purpose of informing Users about the Administrator's activity and promoting various events, services and products, as well as communicating with users through functionalities available on social media. The legal basis for the processing of personal data by the Administrator for this purpose is the Administrator's

legitimate interest (Article 6(1)(f) GDPR), consisting in promoting its own brand and building and maintaining a community associated with the brand.

9. YOUR RIGHTS

In connection with the collection of your data, you have rights, about which we are obliged to inform you. If you wish to exercise any of these rights, simply send us a message. You may use the following contact details without incurring any costs other than those charged by your telecommunications service provider for sending the message:

by email: **kontakt@kupbilecik.pl**
by post: **ul. Własna 6, 75-377 Koszalin, Poland**

For your security, we reserve the right to obtain further information when responding to an existing enquiry in order to confirm your identity. If identification proves impossible, we also reserve the right to refuse to act on your enquiry. You have the right to request information from us regarding the storage of your personal data by us, in accordance with Article 15 GDPR. You have the right to request the rectification and/or completion of your personal data in accordance with Article 16 GDPR. You have the right to have your data erased in accordance with Article 17 GDPR. You have the right to request that the processing of your personal data be restricted if you contest the accuracy of the data stored about you, if the processing is unlawful, or if we no longer need the data, in accordance with Article 18 GDPR. You have the right to request that your personal data be transmitted by the controller directly to another controller in accordance with Article 20 GDPR. You have the right to obtain a copy of the data provided to us, which will be sent to you in a standard format enabling it to be read electronically. If your personal data are processed on the basis of legitimate interest under Article 6(1)(f) GDPR, you have the right to object at any time to the processing, in accordance with Article 21 GDPR. You have the right to withdraw your consent to data collection at any time, with effect for the future. This will not affect data collected to date. If the processing of your personal data infringes data protection regulations or if your data protection rights have been infringed in any other way, you may lodge a complaint with the President of the Personal Data Protection Office. Upon erasure of your data, you will no longer have access to services related to our products through our website. Processing of data that we are obliged to retain in accordance with statutory requirements, the company agreement or contractual requirements will be restricted in order to prevent their use for other purposes, but such data will not be erased.

10. To whom do we disclose your personal data?

In connection with the provision of services, personal data may be disclosed to external entities only to the extent necessary to achieve the purpose of processing, in particular to:

- event organisers, in order to enable the proper organisation and execution of the event;
- entities cooperating with the Administrator or the organiser in the field of ticket distribution, in particular entities holding a dedicated ticket pool intended for a specific group of persons (e.g. employers, event partners, sponsors, local government units or other institutions);
- banks and payment operators;
- entities providing accounting, legal or audit services;
- courier or postal companies;
- entities providing IT, hosting or marketing services;
- public authorities or other entities authorised under applicable law.

a. Transfer of data in connection with a dedicated ticket pool

Where a specific pool of tickets is intended for a designated entity (e.g. an event partner, employer, sponsor or local government unit), the Administrator may transfer to that entity personal data of persons who purchased tickets from that pool. The data are transferred only to the extent necessary to verify entitlement to use the dedicated ticket pool and for the proper organisation of the event.

The scope of the transferred data will include:

- name and surname;
- email address;
- information on the number of tickets purchased.

These data do not include payment information, address data, history of other purchases or any other data unrelated to the entitlement to use the dedicated ticket pool. The legal basis for processing data in this respect is:

- Article 6(1)(b) GDPR – performance of the ticket sale agreement;
- Article 6(1)(f) GDPR – the legitimate interest of the Administrator and of the entity for which the dedicated ticket pool was created, consisting in ensuring proper ticket distribution and verifying entitlement to use that pool.

b. Transfer of data in connection with the actual ticket recipient

Where the payer for the ticket is a local government unit, personal data of the person using the ticket may be transferred to that unit for the purpose of proper settlement and verification of entitlement to use the ticket. Information about the person using the ticket may also be included on the invoice issued to the local government unit as the payer. The data are transferred only to the extent necessary for: verification of entitlement to use the dedicated ticket pool and proper organisation of the event.

The scope of the transferred data will include:

- name and surname;
- email address;
- information on the number of tickets purchased.

These data do not include payment information, address data, history of other purchases or any other data unrelated to the entitlement to use the dedicated ticket pool. The legal basis for processing data in this respect is:

- Article 6(1)(b) GDPR – performance of the ticket sale agreement;
- Article 6(1)(f) GDPR – the legitimate interest of the Administrator and of the entity for which the dedicated ticket pool was created, consisting in ensuring proper ticket distribution and verifying entitlement to use that pool.

11. DATA RETENTION PERIOD

We process and store your personal data only for the period necessary to fulfil the purpose of their storage or for as long as this is required of us under law or regulations. As soon as the purpose ceases to apply or is fulfilled, your personal data will be erased or their processing will be restricted. Where processing is restricted, such data will be erased as soon as the data retention periods imposed by law, the company agreement/statute or contractual provisions no longer prevent such erasure, provided that there is no reason to assume that such erasure would threaten legitimate interests and provided that such erasure would not require disproportionate effort due to the particular nature of storage. Data processed in connection with the purchase of tickets may be stored for the period necessary to execute the event and until the expiry of limitation periods for claims arising from the concluded ticket sale agreement or from applicable law.

12. Security of your data

SZTOLDO.PL Spółka z ograniczoną odpowiedzialnością Spółka komandytowa uses the SSL protocol to protect Customers' personal data. An SSL certificate is a tool that encrypts data transmitted electronically between the server and the user in order to prevent confidential data from being intercepted. An SSL certificate confirms the credibility of the website and helps ensure that the user connects to the correct service. In matters not regulated by this Policy, the provisions of 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, shall apply. In the mobile applications, communication with the server takes place exclusively via an encrypted HTTPS connection, and user session data is stored in the secure storage provided by the device's operating system.

13. Transfer of data outside the European Economic Area

As a rule, personal data are not transferred outside the European Economic Area. If the Administrator uses IT tools provided by entities established outside the EEA, data may be transferred outside the EEA only with the application of appropriate safeguards required by the provisions of the GDPR. This applies in particular to Google services (Firebase) used by the KupBilecik application. Data collected by Microsoft Clarity are received by Microsoft Ireland Operations Ltd., which may transfer them to Microsoft Corporation in the USA on the basis of standard contractual clauses.

14. Mobile applications

The Controller provides two mobile applications: **KupBilecik**, intended for ticket purchasers, and **KB Organizator**, intended for event organisers cooperating with the Controller under an agreement. To the extent not regulated in this section, the remaining provisions of this Privacy Policy shall apply.

a. Data processed in both applications

- account data: first and last name, email address, telephone number and account identifier,
- push notification token together with the device type,
- diagnostic data transmitted in the event of a crash or malfunction: error description, application version, device operating system and the identifier of the logged-in user.

The legal basis for the processing is the performance of a contract for the provision of electronic services (Article 6(1)(b) of the GDPR) and the Controller's legitimate interest in ensuring the security and proper functioning of the applications (Article 6(1)(f) of the GDPR).

b. Data processed exclusively in the KupBilecik application

- order and ticket history, as well as preferences, including selected event categories and cities,
- device location, if the user grants permission in the device settings, for the purpose of suggesting nearby events; this permission may be withdrawn at any time in the device settings without affecting the other functions of the application,
- when signing in via Google, Facebook or Apple: the email address and name provided by the selected provider, solely for the purpose of creating or authenticating the user's account,
- application usage data collected by Google Firebase Analytics, including the app instance identifier and application launch and session events, for the purpose of measuring application stability and how the application is used, based on the Controller's legitimate interest (Article 6(1)(f) of the GDPR).

Payments are processed by a payment service provider; the Controller does not receive payment card details. The selection of a parcel collection point takes place in a window provided by the courier service provider and embedded in the application, in accordance with that provider's privacy policy.

c. Data processed exclusively in the KB Organizator application

- company account data: company name, address, postal code, city and province,
- data of employees for whom the organiser creates subordinate accounts: first and last name, email address and telephone number; the organiser is responsible for informing such persons about the processing of their personal data by the Controller,
- the content of an account deletion request.

The application does not contain any analytics, advertising or tracking tools. The camera is used solely to scan ticket codes at the entrance to an event; the image is processed locally and is not transmitted. Only the scanned code is sent to the Controller.

d. Tracking

Data from the applications is not linked with data from applications or websites other than KupBilecik for advertising purposes and is not disclosed to data brokers.

e. Account deletion

A user may delete their KupBilecik account independently via the customer panel in the account settings. An organiser's account is deleted upon a request submitted through the KB Organizator application under Settings > Account deletion. The request is confirmed and processed by the

Controller's team. The deletion is not carried out automatically because the organiser is bound by an agreement with the Controller and the same device may be used as a ticket scanner during an ongoing event.

In both cases, an account deletion request may also be submitted via the contact form, by email to kontakt@kupbilecik.pl, or at: https://www.kupbilecik.pl/en/delete-account/