

ENTERIUM

PRIVACY POLICY

Last updated: September 2024

This privacy policy applies to the following situations in which your personal data is collected:

- 1. visiting our website https://enterium.pl/ (the "Service" or "Website");
- contacting us via our email or the electronic contact form available on the Website, or when we contact you via email;
- 3. contacting us via the form available on the Website that enables the use of the "Free Valuation of Your Company" service".

DATA ADMINISTRATOR

The administrator of your personal data is **ENTERIUM Sp. z o.o.**, with its registered office in Chorzów (41-500), at Metalowców 13, entered in the register of entrepreneurs maintained by the District Court of Katowice – Wschód in Katowice, VIII Commercial Division of the National Court Register under KRS number: 0000357530, NIP: 0000357530, REGON: 2416102460 (hereinafter referred to as the "Controller" or "Enterium").

Your personal data is processed in accordance 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 (OJ L 119, p. 1) (hereinafter "**GDPR**"), as well as other applicable data protection laws.

CONTACT DETAILS

If you have any questions regarding the use of your personal data or wish to exercise your rights concerning your personal data, please contact us through one of the following methods:

- 1. by email: dpo@enterium.pl;
- 2. by postal mail to the address indicated in the Data Controller section;
- 3. through the "schedule a meeting" section.

WEBSITE

When you use our Service, we process your personal data (including your IP address or other identifiers and information collected via cookies or similar technologies) for the following purposes:

- To provide electronic services by ensuring users have access to the content available on the Service – the legal basis for processing is the necessity to process data to perform the agreement for the provision of electronic services (Article 6(1)(b) of the GDPR)
- For analytical and statistical purposes the legal basis for processing is our legitimate interest (Article 6(1)(f) of the GDPR), which involves analyzing user activity and preferences to improve the functionalities and services provided.

CONTACT

On our Website, you can find an electronic contact form labeled "schedule a meeting," which allows you to get in touch with us.



Using the form requires providing personal data necessary to schedule the meeting (your name and email address). Providing your name and email address is voluntary; however, failure to provide this information will result in the inability to contact you.

When you contact us via our "schedule a meeting" contact form available on our Website, by email, or through traditional mail, we process your personal data for the following purposes:

- To identify you as the sender in order to process your inquiry submitted via the electronic contact form – the legal basis for processing is the necessity to process the data for the performance of a service agreement (Article 6(1)(b) of the GDPR). For any optional data provided, the legal basis is our legitimate interest in being able to respond to inquiries regarding our business activities (Article 6(1)(f) of the GDPR);
- 2. To contact you in order to handle your request submitted via email or traditional mail, to communicate with you regarding our agreement or other arrangements, or to continue further correspondence with you the legal basis for processing is our legitimate interest in being able to respond to inquiries regarding our business activities or other requests for contact initiated by you, or in entering into or performing an agreement with the person or entity you represent (Article 6(1)(f) of the GDPR). If we send you our correspondence or respond to your correspondence related to an agreement that is to be concluded or is being concluded with you, the legal basis for processing is the necessity of processing for the performance of the agreement or for taking steps at your request prior to entering into such an agreement (Article 6(1)(b) of the GDPR);
- 3. In the case of marketing correspondence, we also process your personal data for the purpose of promoting our products and services – in such cases, the legal basis for processing is your consent (Article 6(1)(a) of the GDPR) to receive such correspondence. We will send marketing information to you electronically only after you have given your consent for such communication.

"Free Valuation of Your Company" SERVICE

On our Website, you can find an electronic contact form labeled "Free Valuation of Your Company," through which you can contact us to use the "Free Valuation of Your Company" service.

Using the form requires providing personal data necessary to use the "Free Valuation of Your Company" service (name, email address, phone number, company VAT number). Providing this data is voluntary; however, failure to provide it will result in our inability to contact you and perform the "Free Valuation of Your Company" service.

hen you contact us via the "Free Valuation of Your Company" contact form available on our Website, we process your personal data for the following purposes:

- To provide the "Free Valuation of Your Company" service electronically the legal basis for processing is the necessity to process the data for the performance of the electronic service agreement (Article 6(1)(b) of the GDPR);
- For direct marketing purposes, provided that you have consented to receive commercial information – the legal basis for processing is your consent (Article 6(1)(a) of the GDPR). We will send marketing information to you electronically only after you have given your consent for such communication;
- For the purpose of pursuing or defending against claims the legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), which is the ability to enforce its rights, including defense against claims.



SOCIAL MEDIA

We may process your personal data when you visit our profiles on social media platforms such as:

- X Portal (<u>Portal X Enterium</u>)
- LinkedIn (LinkedIn Enterium)
- YouTube (<u>YouTube Enterium</u>)

When you access our social media profiles or engage with other content we share through social media, we may process your data for the following purposes:

• To manage our social media profiles, inform you about our activities, and promote various events, products, and services. The legal basis for processing your personal data for this purpose is our legitimate interest (Article 6(1)(f) of the GDPR), which involves promoting our brand and products.

LINKEDIN

When a user accesses our company profile on LinkedIn, LinkedIn will process the data provided to LinkedIn. Additionally, LinkedIn will process information about the user's interactions with Enterium's company page. In relation to this processing, LinkedIn (LinkedIn Ireland Unlimited Company) and Enterium act as joint controllers pursuant to Article 26 of the GDPR concerning the data contained in page insights provided to Enterium by LinkedIn. The Page Insights provided to Enterium consist of aggregated data, and LinkedIn will not provide Enterium with the user's personal data nor enable Enterium to link Page Insights to any specific user.

Information regarding the processing of personal data by LinkedIn can be found in the privacy policy available at: <u>https://www.linkedin.com/legal/privacy-policy?#use</u>.

More detailed information about the joint controllership between LinkedIn Ireland and Enterium can be found in the joint controller addendum available at: <u>https://legal.linkedin.com/pages-joint-controller-addendum</u>.

NAME	DOMAIN	DESRIPTION	DURATION	ТҮРЕ
cf_bm	.hubspot.com	This cookie, set by Cloudflare, is used to support Cloudflare's bot management.	1 hour	Necessary
hssc	.enterium.pl	HubSpot sets this cookie to track sessions and determine whether HubSpot should increment the session number and timestamp in thehstc cookie.	1 hour	Necessary
hssrc	.enterium.pl	This cookie is set by HubSpot whenever it changes the session cookie. The hssrc cookie set to 1 indicates that the user has restarted their browser, and if the cookie does not exist, it is assumed to be a new session.	Session	Necessary
hstc	.enterium.pl	HubSpot sets this primary cookie to track visitors. It contains the domain, initial timestamp (first visit), last timestamp (most recent visit), current timestamp	6 months	Analytical

COOKIES FILES



		(this visit), and the session number		
		(increments with each subsequent session).		
_cfuvid	.hubspot.com	It helps to identify trusted web traffic and provides protection against bots by verifying user behavior. This cookie typically works to enhance the security of the site and ensure that legitimate users can access content without disruption.	Session	Other
_Ga	.enterium.pl	Google Analytics sets this cookie to calculate data about visitors, sessions, and campaigns, as well as to track website usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to identify unique visitors.	1 year 1 month 4 days	Analytical
Ga*	.enterium.pl	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytical
_gat_gtag_U A_*	.enterium.pl	Google Analytics sets this cookie to store a unique user identifier.	1 minute	Analytical
_Gid	enterium.pl	Google Analytics sets this cookie to store information about how visitors use the website, while also creating an analytics report on the website's performance. Some of the data collected includes the number of visitors, their source, and the pages they visit anonymously.	1 day	Analytical
_hjAbsolute SessionInPro gress	.enterium.pl	Hotjar sets this cookie to detect the user's first pageview session, which is marked by a True/False flag set by the cookie.	1 hour	Functional
_hjFirstSeen	.enterium.pl	Hotjar sets this cookie to identify the first session of a new user. It stores a True/False value, indicating whether Hotjar has seen this user for the first time.	1 hour	Analytical
_hjIncludedI nSessionSa mple_33750 50	.enterium.pl		1 hour	Other
hjSesja*	.enterium.pl	Hotjar sets this cookie to ensure that data from subsequent visits to the same site is attributed to the same user identifier, which is stored in the Hotjar user ID, unique to this site.	1 hour	Analytical
hjSessionU ser*	enterium.pl	Hotjar sets this cookie to ensure that data from subsequent visits to the same site is assigned to the same user identifier, which is stored in the Hotjar user ID and is unique to this site.	1 year	Analytical
AnalyticsSyn cHistory	. linkedin.com	LinkedIn sets this cookie to store information about the synchronization time with the Ims_analytics cookie.	1 month	Analytical
bcookie (plik cookie)	.linkedin.com	LinkedIn sets this cookie from LinkedIn sharing buttons and advertising tags to recognize browser identifiers.	1 year	Advertising
User Match History	.linkedin.com	LinkedIn sets this cookie to synchronize LinkedIn Ads ID.	1 month	Functional



hubspotutk:	.enterium.pl	HubSpot sets this cookie to track website visitors. This cookie is transmitted to HubSpot upon form submission and is used for contact deduplication.	6 months	Analytical
li_gc	.linkedin.com	LinkedIn sets this cookie to store the visitor's consent for the use of cookies for purposes other than those strictly necessary.	6 months	Functional
li_sugr	.linkedin.com	LinkedIn sets the lidc cookie to facilitate data center selection.	3 months	Advertising
lidc	.linkedin.com	LinkedIn sets the lidc cookie to facilitate data center selection.	1 day	Functional
File BSCOOKIE	.www.linkedin.com	LinkedIn sets this cookie to store actions performed on the website.	1 year	Advertising
pll_language	enterium.pl	Polylang sets this cookie to remember the language selected by the user when returning to the website and to retrieve language information when it's not available through other means.	1 year	Functional

We also inform you about the types of cookies we use on our Website.

Cookies are small text files installed on the device of a user browsing the Service. Cookies collect information that makes using the Service easier – for example, by remembering your visits to the Service and actions performed.

On the Website, we collect the following cookies:

FUNCTIONAL COOKIES

The use of cookies to collect data, including accessing data stored on your device, requires your consent. This consent can be withdrawn at any time.

Consent is not required only in the case of cookies that are necessary for the provision of a telecommunications service (data transmission to display content).

You can withdraw your consent to the use of cookies through your browser settings. Detailed information on this can be found at the following links:

- Internet Explorer
- Mozilla Firefox
- Google Chrome
- <u>Opera</u>
- <u>Safari</u>

At any time, you can review the status of your current privacy settings in your browser by using the tool available at the following link <u>https://optout.aboutads.info/?c=2&lang=EN</u>



ANALYTICAL AND MARKETING TOOLS USED BY OUR PARTNERS

We and our partners use various solutions and tools for analytical and marketing purposes. Below you will find basic information about these tools. More detailed information on this can be found in the privacy policy of the respective partner.

GOOGLE ANALYTICS

Google Analytics cookies are used by Google to analyze how users interact with the Service, create statistics, and generate reports on the functioning of the Service. Google does not use the collected data to identify the user nor does it combine this information to enable identification. Detailed information on the scope and principles of data collection related to this service can be found <u>here</u>.

OTHER PURPOSES OF PROCESSING

We may also process your personal data for the following purposes:

- To fulfill legal obligations imposed on Enterium, such as providing information and documents required by public administration authorities – the legal basis for processing is the necessity to comply with a legal obligation to which the controller is subject (Article 6(1)(c) of the GDPR);
- 2. To establish or pursue claims, or defend against claims the legal basis for processing is our legitimate interest (Article 6(1)(f) of the GDPR), which involves the protection of rights.

PERIOD OF PROCESSING YOUR PERSONAL DATA

We will not use or store personal data longer than is necessary to achieve the aforementioned purposes, and the collected personal data will be deleted after the period necessary to achieve the purposes described in this document or to fulfill contractual obligations, or as permitted or required by applicable law. Specific retention periods for personal data are indicated for each of the listed processing purposes:

- In cases where we process your data for the purpose of fulfilling a contract (e.g., to provide you with content from the Service, allow you to use the contact form, or conduct email correspondence related to the agreement made with us) – your data will be processed for the duration of the contract, and after that period, for no longer than the period of potential claims limitation;
- In cases where we process your data based on your consent your data will be processed for no longer than is necessary to achieve the purpose for which consent was given and no longer than until you withdraw your consent;
- **3.** In cases where we process your data to fulfill our legal obligations your data will be processed for no longer than the duration of these legal obligations;
- 4. In cases where we process your data based on our legitimate interest your data will be processed until the purpose of our interest is fulfilled (e.g., for the duration of correspondence) or until you object to the processing of your data for such purposes. In cases where we process your data for the purpose of establishing, pursuing, or defending against claims, your data will be processed for the duration of the proceedings and, optionally, for the limitation period of potential claims.



SOURCE OF DATA

Generally, we collect your data directly from you. However, there are situations where we receive your data directly from a third party in order to provide you with support services. In such cases, we receive information such as your identification data, which allows us to contact you, as well as any data included in the issue report.

Additionally, if you are an employee or representative of our business partner, we may receive your identification data (such as your name, email address, and position) from them.

YOUR RIGHTS

In connection with the processing of your personal data, you have the right to:

- Object to the processing of your data if the basis for processing is our legitimate interest in accordance with Article 6(1)(f) of the GDPR. In such a case, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims;
- 2. Withdraw your consent to the processing of personal data (which you have granted) at any time. Withdrawal of consent does not affect the legality of processing carried out based on consent before its withdrawal. You may withdraw your consent to receive marketing content at any time. In such a case, we will no longer process your personal data for this purpose.
- 3. Access your personal data;
- 4. Request that we rectify your data;
- 5. Request that we delete your data to the extent provided by law;
- 6. Request that we restrict the processing of your data to the extent provided by law;
- **7.** Request the transfer of your data, if processing is carried out in an automated manner and if the data is processed in connection with a contract;
- File a complaint with the local supervisory authority in Poland, this is the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw, more information: https://uodo.gov.pl/en/484).

RECIPIENTS OF YOUR DATA

Enterium does not and will not sell its customers' personal data. We disclose your data only to the extent permitted by this statement. We may share information with the types of third parties described below, and we always ensure that when sharing information, these third parties comply with the same principles.

In relation to the processing of data for the purposes specified in this Policy, the recipients of your personal data may be:

- 1. Our authorized personnel, as well as authorized personnel of our subcontractors;
- 2. Entities providing services on our behalf, such as those managing our IT systems, hosting services for website management, advertising agencies, advisory services, legal services, debt collection, accounting, and auditing services, particularly:
- 3. The provider of our email system Microsoft Ireland Operations Limited if we conduct correspondence via email;
- 4. Social media providers;



We reserve the right to disclose selected information about the user to the appropriate authorities or third parties who request such information on a proper legal basis and in accordance with applicable law.

TRANSFER OF DATA OUTSIDE THE EEA

The level of personal data protection outside the European Economic Area (EEA) differs from that provided by European law. For this reason, we only transfer personal data outside the EEA when it is necessary and with an appropriate level of protection. Transfers of data outside the EEA take place, in particular:

1. If our subcontractor is located outside the EEA, transfers are most often made based on standard contractual clauses approved by the European Commission or based on a European Commission decision confirming an adequate level of personal data protection in each country.

To obtain a copy of the European Commission decision or the standard contractual clauses, you can contact us using the information provided in Section II.

SECURITY OF YOUR DATA

Enterium makes every effort to protect the security of your personal data. We use various security technologies and procedures to safeguard your personal data from unauthorized access, use, or disclosure.

Enterium takes reasonable measures to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction.

The servers where your personal data is stored are located in a controlled environment with restricted access. Although we strive to protect the personal data we knowingly collect directly from you, no security system is impenetrable.

PROFILING

The Administrator may use profiling on the Service to tailor offers to individual users. The results of profiling may be used for the Administrator's marketing purposes, to customize its offers to users' needs, and to improve the services provided. For example, you may receive a proposal for a service agreement that matches your interests. The Administrator, based on the results of profiling, cannot decide to enter into or refuse to enter into a service agreement with the user. It is always the user who independently decides whether or not to use the offered services.

We do not make decisions based solely on automated processing, including profiling, that would have legal effects or similarly significantly affect you.