

PRIVACY AND COOKIES POLICY

This privacy policy is for information purposes only. The privacy policy primarily contains rules related to the processing of personal data on the website www.pfrventures.pl (hereinafter: "Website"), including the basis, purposes and scope of the processing of personal data and the rights of data subjects, as well as information on the use of cookies and analytical tools and other technologies on the Website.

The Website Owner reserves the right to make changes to the Policy. Any person using the Website (or any part of it) in any way shall be bound by the current Policy.

The content of the pages on the Website and the name of the Website are protected by law. The documents, articles, graphics, scripts and other files forming the pages or other Websites within the Website are the property of PFR Ventures sp. z o.o. or have been used with the consent of the authorised persons.

Terms used in this Policy shall have the following meanings:

1. **Controller** - a physical or legal person, public authority, unit or other entity which alone or jointly with others determines the purposes and means of the processing of personal data. The Controller of the personal data processed within the Website is the PFR Ventures sp. z o.o. based in Poland.
2. **Personal data** - any information about an identified or identifiable natural person ('data subject'). This information may include name, device IP no., internet identifier and information collected through cookies and other similar technology.
3. **Company** - the PFR Ventures with limited liability company with registered office in Warsaw, Poland, at ul. Krucza 50, 00-025 Warszawa, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register under KRS no. 0000533101, NIP: 7010451067, e-mail: biuro.zarzadu@pfrventures.pl, amount of share capital: 123 698 800,00 PLN, telephone number: +48 22 274 23 73.
4. **Cookies** - small files in HTML code that our Website sends to your browser, which you use, and which your browser sends back to our Website on subsequent accesses. If you access our Website the cookies monitor and record the fact that you have used our Website.
5. **Policy** - this Privacy and Cookies Policy.
6. **GDPR** – 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).
7. **Website** – website operated by the Controller under the domain www.pfrventures.pl.
8. **User** - any natural person visiting the Website or using one or more services or functionalities of the Website.



Other terms used in this document shall have the meaning given to them in the text of the GDPR. For definitions of these terms, please refer to Article 4 of the GDPR on the website indicated: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

I. Cookies Policy

The Controller values the privacy of the Website users and therefore informs how it uses Cookies and other similar technologies (hereinafter: "Cookies").

The Cookies used by the Controller are safe for the user's device. In particular, it is not possible for viruses or other unwanted software or malware to enter the user's device via this route. The Cookies make it possible to identify the software used by the user and to adapt the settings of the website individually for each user. The Cookies usually contain the name of the domain from which they originate, the time they are stored on the device and the assigned value.

Scope of personal data processed through the use of the Cookies

Within the scope of the Cookies used, we may in particular collect the following information concerning Users:

- information on the use of the Website (in particular, data on visited sub-pages, time of viewing individual pages, User's location and the type of device he/she uses to view the Website, IP address, operating system and its version, language used on the device, device screen resolution, used web browser);
- the identifier of the Cookies installed on your terminal equipment and the duration of their storage;
- data on the use of other websites (e.g. source of visits to the Website, consent to the installation of Cookies on other websites).

The Cookies may be combined with other information we have about you, provided by you or resulting from your activities on the Website:

- name, postal address, email address, telephone number;
- information provided in communications with you as a User or provided by you in a message addressed to us by post, email, social media or by telephone.

List of the Cookies used on the Website:

With the exclusion of the Cookies that are essential for the operation of the Website, it is a condition of the operation of the Cookies that you agree to install them through the Cookie management tool that will be displayed to you when you visit the Website and that you do not delete them from your disk.

Your use of the Website after you have accepted the installation of any of the Cookies means that they will be stored on your terminal device for the duration provided for each individual Cookie. You can change your Cookie settings at any time via the Cookie management tool or your browser settings.

On the Website, we use our own Cookies (so-called first-party cookies - coming directly from the Controller) and external Cookies (so-called third-party cookies - coming from third parties).

For what purposes are the Cookies used and is the User's consent needed?

Type of the Cookies	Is the content needed?	Purpose
1. Operation of the Website [Essential Cookies]	Always active Consent is not needed	You cannot deactivate these Cookies as they are essential for the Website to function properly. As part of these Cookies, the cookie settings you define are also saved. They also enable us to prevent fraud and detect errors. These Cookies are always active and cannot be deactivated.
2. The Website customised to you [Preference Cookies]	Consent is needed	These Cookies enable us to provide you with an efficient and user-friendly service, customised to your preferences, and allow us to continuously improve it. Among other things, they allow us to check how you use our Website and whether our communications are of interest to you, e.g. we check how often you access our Website, which features of the Website you use, which job vacancies you apply for or whether you open emails we have sent you.
3. Convenient use of the Website [Analytics Cookies]	Consent is needed	These Cookies allow us to provide you with various useful features on our Website and to remember your settings or interests, e.g. regarding language, font size or other presentation settings of our Website. Thanks to these Cookies, our mechanisms are also able to read which video settings are most suitable for your device.

Storage period for the Cookies:

The Cookies currently used by the Website are stored on your device for the time specified in their parameters or until they are deleted by you. The duration of storage of Cookies is displayed to the User within the tool used to manage consent to the installation of Cookies, i.e. in the message concerning the acceptance of Cookies when entering the Website.

Managing and deleting and disabling the Cookies:

Our authority to store and access Preference and Analytics Cookies is based on the consent you have given as a User of our Website. You have the ability to withdraw your consent at any time by returning to your settings and specifying the conditions under which we store or access this information. You can also manage your Cookie settings from within your browser by selecting the appropriate options in your privacy settings. Please note, however, that disabling the Cookies may affect the functionality of the Website.

We use a Cookie Consent Management tool that will allow the User to control which Cookies will be used by the Website with the exclusion of cookies that are essential for the use of our Website. These Cookies contribute to the usability of the Website by providing basic functions without which the Website cannot function properly.

You can access the cookie management tool on your first visit to the Website, or by accessing the tool after clicking on the appropriate icon displayed on the interface of the Website.

The tool we use allows three different solutions for the installation of the Cookies:

- Agreeing to the installation of all Cookies used on the Website;
- To consent to the installation of Cookies of your choice;
- Refusing to consent to the installation of all Cookies (except for Cookies essential for the proper functioning of the Website).

Within the Cookie consent management tool, you will obtain detailed information on each of the Cookies we use on the Website, together with information on their type and description of their functionality, the provider of the particular Cookie and the duration of the processing of your personal data.

On some mobile devices, you can block the installation of Cookies by default. Some manufacturers of mobile devices also allow you to change your settings to adapt advertising to your interests.

Third party Cookies:

We also use third party providers (partners) who may place Cookies on your device in order to collect and use information about how you use our Websites for advertising and analytical purposes. You can find more information about these Cookies in the privacy policies of our partners, such as Google Analytics, LinkedIn Analytics.

This Policy does not apply to websites and entities whose contact details are indicated on the Website or in the e-mail addresses posted on the Website. Links indicated on the Website may refer to other websites not operated by the Controller. The Controller shall not be responsible for compliance with applicable data protection regulations or the safe processing of your personal data by operators of other websites.

The Website also uses the IFRAME solution, which allows the view of another website to be displayed inside the Website.

You may also refuse the collection of personal data by third party cookie providers at any time by changing the settings of the browser you use on your device when visiting any of the websites.

II. Privacy Policy

Information on the processing of personal data

Controller

The Controller of your personal data is the PFR Ventures sp. z o.o. with registered office in Warsaw, Poland, address: ul. Krucza 50, 00-025 Warszawa entered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register under the number KRS 0000533101, NIP: 7010451067.

Scope of data processing

We process the following categories of your data: identification data (first name, surname), contact data (telephone number, e-mail address, company name) IP address data and information on the use of the Website, as well as other personal data collected through the use of the Cookies and provided by the User in the contact form or other features of the Website.

Contact data

In order to obtain information related to the processing of personal data, by the Controller, please contact the Controller directly at the address indicated above or electronically at biuro.zarzadu@pfrventures.pl or the

appointed Data Protection Officer (DPO) as follows: by postal mail directing correspondence to the address: ul. Krucza 50, 00-025 Warszawa or by electronic contact at the e-mail address: iodo@pfrventures.pl.

Purpose and basis of processing

Personal data obtained through the Website are processed by the Controller in accordance with applicable law, in particular 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 (General Data Protection Regulation)- hereinafter „GDPR”.

The use of the Website is voluntary. Equally, the related provision of personal data by the user of the Website is voluntary.

The Controller takes special care to protect the interests of individuals whose personal data he processes. Considering the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons of varying probability and seriousness, the Controller shall implement appropriate technical and organisational measures to ensure that the processing is carried out in accordance with the GDPR and to be able to demonstrate this. These measures shall be reviewed and updated as necessary. The Controller shall apply technical measures to prevent the obtaining and modification by unauthorised persons, of personal data transmitted electronically.

Your personal data will be processed for the following purposes:

- proper management of the Website and ensuring the security of the Website and its users, use of the Website for informative purposes without using additional functions or services, including documenting the obtaining of consent for the installation of the Cookies in the consent management tool (legal basis: the Controller's legitimate interest in ensuring access to the Website and the functionality and optimisation of websites and security of IT systems, i.e. Article 6(1)(f) of the GDPR),
- exchange of correspondence, including responding to your enquiries concerning products and services provided by the Company , including responding to questions sent via the contact form (legal basis: legitimate interest of the Administrator i.e. Article 6(1)(f) GDPR, concluded contract, if the contact from your side concerns a contract binding you with the Administrator i.e. Article 6(1)(b) GDPR and Article 9(2)(a) GDPR - in case you provide on your own initiative in your correspondence special categories of data within the meaning of GDPR),
- the provision of a newsletter service for the purpose of sending requested information, offers and other content of an informative or commercial-marketing nature (legal basis: the concluded contract for the provision of newsletter services, i.e. Article 6(1)(b) GDPR and your consent to receive a newsletter, i.e. commercial information, including direct marketing, at the e-mail address provided by you),
- customer satisfaction surveys (legal basis: the Controller's legitimate interest in surveying customer satisfaction in order to improve the quality of the services provided, i.e. Article 6(1)(f) GDPR),
- reporting or defence legal claims related to the operation of the Website and the prevention and investigation of crimes related thereto (legal basis: legitimate interest of the Administrator, i.e. Article 6(1)(f) GDPR).

We may also process your personal data in order to comply with legal obligations imposed on us. This processing then is carried out on the basis of Article 6(1)(c) GDPR.

Data processing of candidates for employment

The Controller processes the personal data provided by the candidate in his/her recruitment application (e.g. CV, cover letter) and in particular may process the following information about the candidate: name, surname, date of birth, contact details (e.g. e-mail, telephone number, address of residence), information on education, professional qualifications, professional experience, as well as image (if the candidate includes his/her photo in the application documents).

If competence tests are carried out and the candidate gives his or her consent to take part in such tests, information on knowledge, skills and personal characteristics (e.g. information on language skills or aptitude for a certain position) is also processed.

The Controller indicates that candidates should not include sensitive data in the recruitment application, such as data on health status, disabilities, political opinions, religious beliefs and other data as defined in Article 9 of the GDPR. If the provision of such data is necessary due to the particular situation of the candidate, the Controller will indicate the basis for such processing and possibly request separate consent for the processing of such data.

The candidate's personal data will be processed for the following purposes:

- a) to carry out the recruitment for the position indicated in the job advertisement for which the recruitment application is sent, including the selection of candidates for the conclusion of a civil law contract (if such form of employment is indicated in the job advertisement);
- b) to carry out future recruitment for various positions, if the candidate has given his/her separate consent;
- c) in case of a successful recruitment, in order to draft an employment contract or a civil law contract (e.g. a cooperation agreement), as well as to provide the candidate with the necessary information concerning the commencement of work - prior to employment, the Controller will provide the candidate with information on the processing of the employee's data;
- d) assert or defend against claims related to the recruitment process.

The candidate's personal data is processed on different legal bases depending on the purpose of the processing

- a) Personal data indicated in the Labour Code (art. 22 (1) or in other legal regulations (e.g. name, surname, date of birth, contact details, education, work experience) or data necessary to take action prior to the conclusion of an employment contract or a civil law contract (e.g. financial expectations, date of commencement of work/providing services) are processed in order to fulfil the Controller's legal obligation (Article 6(1)(c) of the GDPR) or due to their necessity to take action at the candidate's request prior to the conclusion of a contract of employment or a civil law contract (Article 6(1)(b) of the GDPR) and their provision will be necessary to participate in the recruitment;
- b) The e-mail address and telephone number are processed on the basis of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR), consisting, among other things, of the possibility of conducting the recruitment by electronic means, efficient communication with candidates. The provision of this data will be necessary to participate in the recruitment;

c) Other personal data (e.g. image, interests) are processed on the basis of consent and their provision does not affect the possibility of participating in the recruitment (Article 6(1)(a) of the GDPR). The provision of this data is voluntary.

As indicated in the job advertisement, the candidate gives his/her consent by including such personal data in his/her recruitment application and by submitting his/her recruitment application to the Controller. Such consent may also be given in other ways indicated by the Controller for specific recruitment processes (e.g. by submitting a specific written declaration or by selecting the indicated checkbox);

d) Personal data are processed for the purposes of future recruitment based on the candidate's consent (Article 6(1)(a) of the GDPR), which he/she expresses in the manner indicated by the Controller for the specific recruitment process (e.g. by including the consent clause indicated by us in his/her CV);

e) in case of possible disagreements between the candidate and the Controller in relation to the recruitment process, the candidate's personal data will be processed on the basis of the Controller's legitimate interest in asserting or defending against claims brought against the Controller before courts or state authorities (Art. 6(1)(f) of the GDPR).

How long are candidates' personal data processed?

a) Personal data are processed for the purpose of recruitment:

- for the position to which the recruitment application relates: for the period necessary to carry out the recruitment process and select the candidate, and then for a period of approximately 6 months in case there is a need to repeat the recruitment process for any reason,
- for a period of 3 years following the sending of the recruitment application if the candidate agreed to the processing of his/her personal data for future recruitment;

b) in the event of a successful recruitment, the personal data shall be further processed based on the rules and periods of processing provided for employees, which will be communicated once the job has started;

c) in case of possible misunderstandings between the candidate and the Controller, personal data is processed for the purpose of claiming or defending against claims for a period of 3 years from the end of the recruitment process. In certain cases, the processing of data may last longer than 3 years, if such a necessity arises from legal provisions

Recipients of your data

Your personal data will be shared with PFR Ventures Group companies and entities required by law. In addition, your data may also be transferred to entities that process personal data on behalf of the Controller - whereby such entities process data on the basis of a contract with the Controller and only in accordance with the instructions of the Controller. If you have given your consent, your data contained in the Cookies may be transferred to the entities that provided such Cookies.

Retention period

Personal data are processed until the legal basis for their processing has expired or the purpose of the processing has been achieved or has otherwise expired. Where the basis for processing is the legitimate interest of the Controller, personal data are stored until the legitimate interest of the Controller is fulfilled or an objection to the processing of personal data is raised.

Where data is processed on the basis of a contract for the provision of newsletter services, personal data is processed until the termination of the contract. On the other hand, personal data processed on the basis of

consent is processed until the expressed consent is withdrawn, which does not affect the lawfulness of the processing performed by the Controller on the basis of consent before its withdrawal.

Rights of the data subject

- The right of access to personal data and the right to request rectification, opposition to processing, erasure or restriction of processing,
- the right to withdraw consent; the withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of consent before its withdrawal,
- the right to data portability, i.e. the right to receive personal data from the Controller in a structured, commonly used machine-readable format (if applicable) for the purpose of possible transfer of such data to another controller,
- the right to lodge a complaint with the supervisory authority (Prezes Urzędu Ochrony Danych Osobowych) dealing with the protection of personal data, if you consider that the processing of personal data concerning you violates the GDPR.

You can assert the above rights, e.g. by providing the Controller with an appropriate notification by e-mail to iodo@pfrventures.pl or by post to the Controller 's registered address.

Automated decision-making (including profiling)

Your personal data is not subject to automated decision-making, including profiling related to automated decision-making.

Transfer of personal data outside the European Economic Area

Transfers of personal data outside the European Economic Area take place only if you have given your consent or we have provided a legal basis for such transfer.

The information generated by the Cookies about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Considering the technical possibilities that allow on the basis of the IP address alone to easily determine a lot of information about you, we inform you that it may constitute personal data and be transferred outside the European Economic Area - to the United States. Google's data protection rules are available on their website.

The European Commission, on July 10, 2023, adopted a decision stating an adequate level of protection of personal data in the United States provided by the so-called "EU-US Data Privacy Framework".

Each of the Controller's partners transferring data outside the European Economic Area to the United States has joined the "EU-US Data Privacy Framework" program and is included in the list maintained by the US Department of Commerce.

CONTACT

In order to exercise your rights, obtain detailed information about the processing of your personal data, you may contact the Controller at the following e-mail address: biuro.zarzadu@pfrventures.pl