

## PRIVACY POLICY

### I. PERSONAL DATA CONTROLLER

The controller of personal data is **"LEARN UP" sp. z o.o.**, with its registered office in Poznań, address: ul. Kazimierza Jarochońskiego 58/1, 60-246 Poznań, entered into the Register of Entrepreneurs maintained by the District Court Poznań – Nowe Miasto i Wilda in Poznań, 8th Commercial Division of the National Court Register, under KRS number **0000301702**, NIP **7792329623**, REGON **300787953**, with a share capital of **PLN 68,625.00** (hereinafter referred to as the **"Controller"**).

The privacy of users visiting the website <https://de.campus.neinver.com/> (the **"Website"**) is of particular importance to the Controller. The data provided by users is used solely for the purposes indicated in this **Privacy Policy**.

### II. CONTACT WITH THE CONTROLLER

You can contact the Controller:

- a. via email at [support@learnup.pl](mailto:support@learnup.pl);
- b. in writing, by sending correspondence to the following address: "LEARN UP" sp. z o.o., ul. Kazimierza Jarochońskiego 58/1, 60-246 Poznań, Poland.

### III. CONTACT WITH THE DATA PROTECTION OFFICER

The Controller has appointed a person responsible for personal data protection – the Data Protection Officer (DPO) Mirosława Stosik, who can be contacted by sending an email to: [mstosik@learnup.pl](mailto:mstosik@learnup.pl)

### IV. INFORMATION SECURITY

The Controller applies appropriate technical and organizational measures to ensure the security of your personal data, including protection against unauthorized access, loss, or destruction. To safeguard personal data, suitable personal, organizational, technical (IT), and physical security measures have been implemented.

Personal data may be processed for different purposes and on various legal bases, depending on how and for what reason they were provided to the Controller. These are described in more detail in Section V below.

### V. DATA PROVIDED TO THE CONTROLLER BY USERS, PERSONAL DATA PROCESSING, PURPOSES, AND LEGAL BASES FOR PROCESSING

To the extent that the Controller collects personal data from users, the Controller acts as the data controller and processes the data in accordance with 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 (General Data Protection Regulation – GDPR), as well as other generally applicable legal provisions.

| Purpose                                  | Legal Basis for Processing                                                                                                                                                                         | Data Retention Period                                                                           |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Use of the Website                       | Article 6(1)(b) of the GDPR – processing necessary for the performance of a contract for the provision of electronic services, consisting of making the content available to users via the website | Until the expiry of the limitation period for any related claims                                |
| Conclusion and performance of a contract | Article 6(1)(b) of the GDPR – processing necessary to take steps at your request prior to entering into a                                                                                          | Until the expiry of the limitation period for claims related to the performance of the contract |

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|                                                                                                                                                    | contract, and processing necessary for the performance of a contract to which you are a party                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                              |
| <b>Marketing</b>                                                                                                                                   | <p>Article 6(1)(f) of the GDPR – when personal data are processed for marketing purposes, the legal basis for such processing is the pursuit of the Controller’s legitimate interests, in particular presenting the Controller’s offer in response to a client’s inquiry made via email, traditional mail, telephone, or for example through a contact form on the website, online chat, etc.</p> <p>Article 6(1)(a) of the GDPR – if you have given your consent to receive marketing communications by email, telephone, or during phone calls, the legal basis also includes Article 398(1) of the Electronic Communications Law. Where the Controller’s partners are granted direct access to this information, the legal basis for such processing is your freely given consent.</p> | Until an objection is raised to the processing of personal data, where the legal basis for processing is a legitimate interest; or until the withdrawal of your consent to the processing of personal data, where the legal basis for processing is consent. |
| <b>Telephone contact, email and traditional correspondence, including via the contact form</b>                                                     | Article 6(1)(f) of the GDPR – processing necessary for the purposes of the Controller’s legitimate interests, namely maintaining continuous communication and enabling contact regarding the services we provide. The Controller processes only personal data relevant to the matter to which the correspondence relates. All correspondence is stored in a manner that ensures the security of the personal data (and other information) contained therein and is disclosed only to authorized persons.                                                                                                                                                                                                                                                                                  | Until the correspondence related to the given matter is concluded, or until the data are no longer necessary for the realization of the Controller’s legitimate interests, or until an objection to the processing of personal data is raised.               |
| <b>Establishing, pursuing, and enforcing claims, as well as defending against claims in proceedings before courts and other public authorities</b> | Article 6(1)(f) of the GDPR – processing necessary for the purposes of the Controller’s legitimate interests, consisting in establishing, pursuing, and enforcing claims, as well as defending against claims in proceedings before courts and other public authorities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Until the expiry of the limitation period for such claims                                                                                                                                                                                                    |
| <b>Fulfilment of legal obligations arising from legal provisions, in particular tax and accounting regulations</b>                                 | Article 6(1)(c) of the GDPR – processing necessary for compliance with legal obligations to which the Controller is subject, arising in particular from tax and accounting laws                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Until the expiry of the legal obligations imposed on the Controller that justify the processing of personal data                                                                                                                                             |

## VI. SCOPE OF DATA

The Controller may process, in particular, the following categories of personal data: first name and last name, company name, email address, telephone number, data used to authenticate an account on the Website, as well as information regarding the user’s activity on the Website.

If you are the recipient of marketing content (e.g. cookies and Google Analytics), we process your data in the form of: first name, last name, email address, IP address, browsing activity history on the Website, location data, device type, and advertising identifier. This data has been obtained directly from you.

All personal data provided by users on the website and collected by the Controller for the purpose of providing services or performing a contract have been obtained by the Controller directly from the user.

## **VII. RIGHTS**

You have the right to:

- a) request access to your personal data, as well as their rectification, erasure, or restriction of processing;
- b) object to the processing of your personal data;
- c) request the transfer of your personal data;
- d) lodge a complaint with a supervisory authority (data protection authority).

At any time, you may object to the processing of your personal data by the Controller where such processing is based on the Controller's legitimate interest (Article 6(1)(f) of the GDPR), by using the communication methods indicated in this Privacy Policy.

Where data are processed based on consent, you may withdraw your consent at any time by contacting the Controller. This applies only to data processed on the basis of your consent, and the withdrawal of consent does not affect the lawfulness of processing carried out prior to its withdrawal.

## **VIII. ENTRUSTMENT OF PERSONAL DATA PROCESSING**

The Controller may delegate the processing of personal data to another entity for the purpose of performing a specific task.

In the event that personal data are entrusted to an external entity for processing, the data processing agreement specifies, in particular: the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects, as well as the obligations and rights of the Controller.

## **IX. RECIPIENTS OF PERSONAL DATA**

Personal data may also be transferred by the Controller to external recipients whose services the Controller uses in order to properly handle processes related to the provision of services. The recipients of your personal data may include the following categories of entities:

- a) IT service providers;
- b) data analytics tool providers;
- c) marketing service providers;
- d) shipping and logistics companies;
- e) telecommunications service providers;
- f) consultants, including law firms and accounting offices;
- g) entities providing administrative support, including correspondence handling, document archiving, and document destruction services;
- h) platforms such as Google, Facebook, Instagram, and YouTube.

In all cases, the processing of your personal data by the above recipients will be carried out on the basis of appropriate authorization, a data processing agreement, or under applicable legal provisions.

Your data may also be disclosed to competent authorities when necessary for the performance of their public duties as defined by law or in connection with the administration of justice.

Information on the current list of entities to whom we disclose your data in connection with its processing can be obtained by contacting us in the manner indicated in Section II above.

#### **X. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

Your personal data will, as a rule, be processed within the European Economic Area (EEA). In exceptional cases, however, it may be transferred to our partners who process data outside the EEA, but only to the extent necessary for our cooperation with those partners. Personal data will be transferred to countries for which the European Commission has issued a decision confirming an adequate level of data protection. In the absence of such a decision, appropriate safeguards will be applied to ensure the security of the data - such as the standard contractual clauses approved by the European Commission. At the same time, we make every effort to ensure that our partners also provide an adequate level of personal data protection. You may obtain a copy of the safeguards applied to the transfer of personal data outside the EEA by contacting the Controller using the contact details provided above.

#### **XI. PROFILING**

Your personal data will not be processed by the Controller in an automated manner (including profiling) for the purpose of making decisions that would produce legal effects concerning you or similarly significantly affect you.

#### **XII. INFORMATION ON THE REQUIREMENT OR VOLUNTARINESS OF PROVIDING DATA AND THE CONSEQUENCES OF FAILURE TO PROVIDE IT**

Providing personal data is voluntary and is not a contractual or statutory requirement. However, without providing such data, it may not be possible to cooperate with the Controller (e.g. to conclude or perform a contract, contact us, or access information and materials about our services).

#### **XIII. COOKIES**

The website uses cookies and other related technologies (“**cookies**”). The Controller primarily uses essential cookies to provide services and enable the functionality of the website.

Cookies are small pieces of text or code that are sent to your browser and returned by it. Some cookies may be stored on your device while browsing the website.

There are different types of cookies. The cookies used on this website are categorized as follows:

- a) **essential cookies** – used, among other things, to ensure the stable operation of the website (they measure traffic, protecting the site from overload);
- b) **functional cookies** – allow the website to remember your selected preferences, e.g. privacy settings, completion of online forms provided by us, or saving website configuration settings;
- c) **statistical cookies** – enable the collection of website usage statistics;
- d) **analytical cookies** – help improve and measure the performance of the website by collecting and reporting information about how the site is used;
- e) **advertising cookies** – used in advertising campaigns to tailor ads and remember their settings.

The Controller primarily uses essential cookies to properly deliver website services and functionalities you wish to use. The legal basis for processing personal data in connection with the use of essential cookies is the necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR). For all other cookies, the so-called “optional cookies” (statistical, analytical, functional, and advertising), the legal basis for processing personal data is your consent (Article 6(1)(a) of the GDPR).

Essential cookies may be installed only by the Controller through the website. The processing of personal data related to the use of advertising cookies is possible only after obtaining your consent, which may be withdrawn at any time.

Cookies used on the website may be:

- a) **temporary** – automatically deleted after a specified expiration date;
- b) **permanent** – remain active in your browser until you delete them manually, which you can do at any time.

Cookies and pixel tags may also be used by third parties (e.g. Google, Facebook) to display their own content or advertisements on websites or platforms based on the data collected through such files and tags.

In most web browsers, you can: delete cookies from your computer's hard drive (via browser settings), block all cookies, or set a warning before cookies are stored.

If you choose to limit or disable cookies in your browser settings, the use of the website may be impossible or restricted. Deleting or blocking certain cookies may affect the availability of website functionalities, correct display of content, or cause the loss of preferred settings.

You have the right to use your browser's built-in tools to view, delete, restrict, or control cookies. For more information, consult your browser's help section or privacy/security settings.

You can adjust automatic settings for the most popular browsers by following these guides: [Chrome](#); [Edge](#); [Firefox](#); [Internet Explorer](#); [Safari](#); or [Opera](#).

#### XIV. CHANGES TO THE PRIVACY POLICY

The Controller may amend this Privacy Policy, in particular to adapt it to the requirements set out by applicable laws. Any changes will be announced on our website, and, where possible, also communicated via email. An integral part of this Privacy Policy is the list of cookies used on the website <https://de.campus.neinver.com/>.

#### Appendix – List of Cookies Used on the Website <https://pl.campus.neinver.com/>

| Name                     | Service               | Purpose                                                                                                                                     | Type and Duration                                       |
|--------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| <b>cross-site-cookie</b> | pl.campus.neinver.com | Ensures browsing security by preventing cross-site request forgery (CSRF) attacks. Necessary for the security of the website and its users. | Essential, session (deleted when the browser is closed) |
| <b>PHPSESSID</b>         | pl.campus.neinver.com | Maintains the user's session identifier, allowing session management while using the website. Deleted when the browser is closed.           | Essential, session                                      |
| <b>_ga</b>               | .neinver.com          | Set by Google Analytics. Used to analyze website traffic, calculate statistics on users, sessions, and campaigns.                           | Analytical, 1 year 1 month 4 days                       |
| <b>_gid</b>              | .neinver.com          | Set by Google Analytics. Helps analyze how users use the website.                                                                           | Analytical, 1 day                                       |
| <b>ga*</b>               | .neinver.com          | Set by Google Analytics to store and count page views.                                                                                      | Analytical, 1 year 1 month 4 days                       |
| <b>rc::a</b>             | google.com            | Set by Google reCAPTCHA to identify bots and protect the site from automated spam attacks.                                                  | Essential, persistent (never expires)                   |
| <b>rc::c</b>             | google.com            | Set by Google reCAPTCHA to identify bots during a user session.                                                                             | Essential, session                                      |