

NEOCODE STUDIO PRIVACY POLICY

This Privacy Policy (hereinafter referred to as the "**Policy**") contains information on the processing of your personal data in connection with the use of the "NeoCode Studio" website, operating at the <https://neocode.studio/> website (hereinafter referred to as the "**Website**") and the sending of the Newsletter by the Controller.

Any capitalized terms not defined otherwise in the Policy shall have the meaning given to them in the Terms and Conditions, available at: https://neocode.studio/terms_and_conditions.pdf

Personal data Controller

The controller of your personal data is Łukasz Szarpak, conducting business under the name: "NeoCode Łukasz Szarpak: (address of a permanent place of business: 28 Czeremchowa Street, 05-501 Piaseczno), registered into the Central Register of Information on Economic Activity, kept by the minister competent for the economy, holding NIP: 1231498489, REGON: 389653143 (hereinafter: "**Controller**").

Contact with the Controller

In all matters related to the processing of personal data, you may contact the Controller using e-mail at: lukasz.szarpak@neocode.studio

Personal data protection measures

The Controller applies modern organizational and technical safeguards to ensure the best possible protection of your personal data and guarantees that it processes it 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) (hereinafter: "**GDPR**"), the Act of 10 May 2018 on the protection of personal data and other provisions on the protection of personal data.

Information about the personal data processed

The use of the Website requires the processing of your personal data. Below you will find detailed information about the purposes and legal grounds of processing, as well as the period of processing and the obligation or voluntariness to provide it.

Purpose of processing	Personal data processed	Legal basis
Handling customer enquiries (including inquiries submitted by e-mail or through provided forms)	1) name and surname 2) e-mail address 3) phone number 4) other data contained in the message to the Controller	Article 6(1)(f) GDPR (processing is necessary for the implementation of the legitimate interest of the Controller, in this case to respond to the received inquiry)
Providing the above-mentioned personal data is voluntary, but necessary to receive a response to the inquiry (the consequence of not providing it will be the inability to receive an answer).		
The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved (whichever occurs first).		

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Newsletter Provision Agreement along with information about the launch of the Application (marketing communication)	e-mail address	<p>Article 6(1)(b) GDPR</p> <p>(processing is necessary for the performance of the Newsletter Provision Agreement together with information about the launch of the Application concluded with the data subject, or to take steps to conclude it)</p> <p>and</p> <p>Article 6(1)(f) GDPR</p> <p>(processing is necessary to pursue the legitimate interest of the Controller, in this case informing about the offered novelties and promotions, including the launch of the Application)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary to receive the Newsletter along with information about the launch of the Application (the consequence of not providing them will be the inability to receive the Newsletter).</p> <p>The Controller will process the above-mentioned personal data at the time of effective objection or achievement of the purpose of processing or until the limitation period for claims arising from the Newsletter Provision Agreement along with information about the start of the Application (whichever occurs first).</p>		

Purpose of processing	Personal data processed	Legal basis
Establishing, exercising, or defending legal claims	<ol style="list-style-type: none"> 1) name and surname/company 2) e-mail address 3) address of residence/registered office 4) PESEL number 5) TIN 	<p>Article 6(1)(f) GDPR</p> <p>(processing is necessary for the purpose of pursuing the legitimate interest of the Controller in this case establishing, pursuing or defending against claims that may arise in connection with the performance of contracts concluded with the Controller)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary to establish, pursue or defend against claims that may arise in connection with the performance of contracts concluded with the Controller (the consequence of failure to provide the above-mentioned data will be the inability of the Controller to take the above-mentioned actions)</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of contracts concluded with the Controller.</p>		

Purpose of processing	Personal data processed	Legal basis
Analysis of your activity on the Website	1) Date and time of visit 2) IP number of the device 3) type of device operating system 4) Approximate location 5) type of web browser 6) time spent on the Website 7) visited subpages and other activities undertaken within the Website	Article 6(1)(f) GDPR (processing is necessary to pursue the legitimate interest of the Controller, in this case obtaining information about your activity on the Website)
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Controller to obtain information about your activity on the Website (the consequence of not providing them will be the inability of the Controller to obtain the above-mentioned information).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved.</p>		

Purpose of processing	Personal data processed	Legal basis
Administration of the Website	1) IP address 2) Server Date and Time 3) Web Browser Information 4) Operating System Information The above data is saved automatically in the so-called server logs, each time the Website is used (it would not be possible to administer it without the use of server logs and automatic saving).	Article 6(1)(f) GDPR (processing is necessary to pursue the legitimate interest of the Controller, in this case to ensure the proper operation of the Website)
<p>Providing the above-mentioned personal data is voluntary, but necessary to ensure the proper operation of the Website (the consequence of not providing them will be the inability to ensure the proper operation of the Website).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved.</p>		

Profiling

To create your profile for marketing purposes and direct marketing tailored to your preferences, the Controller will process your personal data in an automated manner, including profiling them – however, this will not have any legal effects on you or significantly affect your situation in a similar way.

The scope of profiled personal data corresponds to the scope indicated above in relation to the analysis of your activity on the Website.

The legal basis for the processing of personal data for the above purpose is Article 6(1)(f) GDPR, according to which the Controller may process personal data to pursue its legitimate interest, in this case conducting marketing activities tailored to the preferences of recipients. Providing the above-mentioned personal data is voluntary, but necessary to achieve the above-mentioned purpose (the consequence of not providing them will be the inability of the Controller to conduct marketing activities tailored to the preferences of recipients).

The Controller will process personal data for the purpose of profiling them until an effective objection is raised or the purpose of processing is achieved.

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Controller:

- a) Amazon Web Services, Inc.
- b) Google LLC.

In addition, personal data may also be transferred to public or private entities, if such an obligation arises from generally applicable provisions of law, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the Controller's use of the services provided by Google LLC, your personal data may be transferred to the following third countries: Great Britain, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

- in the case of the United Kingdom, Canada, Israel, Japan and South Korea, decisions of the European Commission determining the adequacy of the level of protection of personal data in each of the above-mentioned third countries;
- for the USA, Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council establishing an adequate level of protection of personal data as provided under the EU-US data protection framework;
- for Chile, Brazil, Saudi Arabia, Qatar, India, China, Singapore, Taiwan (Republic of China), Indonesia and Australia, adequacy contractual clauses in line with the standard contractual clauses set out in Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

You may obtain from the Controller a copy of the data transferred to a third country.

Permissions

In connection with the processing of personal data, you have the following rights:

- 1) the right to be informed about what personal data concerning you is processed by the Controller and to receive a copy of this data (the so-called right of access). The issuance of the first copy of the data is free of charge, for subsequent copies the Controller may charge a fee;
- 2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request that it be rectified;
- 3) in certain situations, you may ask the Controller to delete your personal data, e.g. when:

- a) the data will no longer be needed by the Controller for the purposes of which he or she has informed;
 - b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
 - c) the processing is unlawful;
 - d) the necessity to delete the data results from a legal obligation incumbent on the Controller;
- 4) in the event that personal data is processed by the Controller on the basis of your consent to processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another controller;
 - 5) if your personal data is processed by the Controller on the basis of your consent to processing, you have the right to withdraw this consent at any time (withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal);
 - 6) if you decide that the personal data being processed is incorrect, their processing is unlawful, or the Controller no longer needs specific data, you may request that for a specified period of time (e.g. to verify the correctness of the data or pursue claims), the Controller does not perform any operations on the data, but only stores them;
 - 7) you have the right to object to the processing of your personal data, the basis for which is the legitimate interest of the Controller. In the event of an effective objection, the Controller will cease to process personal data for the above-mentioned purpose;
 - 8) you have the right to lodge a complaint with the President of the Personal Data Protection Office if you believe that the processing of your personal data violates the provisions of the GDPR.

Cookies

1. The Controller informs that the Website uses "cookies" installed on your end device. These are small text files that can be read by the Controller's system, as well as by systems belonging to other entities whose services are used by the Controller (e.g. Facebook, Google).
2. The Controller uses cookies for the following purposes:
 - a) ensuring the proper operation of the Website – thanks to cookies, it is possible to operate the Website efficiently, use its functions and conveniently move between individual subpages;
 - b) increasing the comfort of browsing the Website – thanks to cookies, it is possible to detect errors on some subpages and constantly improve them;
 - c) creation of statistics – cookies are used to analyse the way users use the Website. Thanks to this, it is possible to constantly improve the Website and adapt its operation to the preferences of users;
 - d) conducting marketing activities – thanks to cookies, the Controller can direct advertisements tailored to users' preferences.
3. Controller can place both permanent and temporary (session) files on your device. Session cookies are usually deleted when you close your browser, while closing your browser does not delete persistent cookies.
4. Information about cookies used by the Controller is displayed in the panel located at the bottom of the Website. Depending on your choice, you can enable or disable cookies of categories (except for essential cookies) and change these settings at any time.
5. The data collected by means of cookies do not allow the Controller to identify you.
6. The Controller uses the following cookies or tools that use them:

TOOL	SUPPLIER	FUNCTIONS AND SCOPE OF DATA COLLECTION	PERIOD OF ACTION
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Strictly Necessary Cookies	Controller	The operation of these files is necessary for the proper functioning of the Website, so you cannot disable them. Thanks to these files (collecting, m.in. the IP number of your device), it is possible, m.in. to inform you about cookies running on the Website	Most of the necessary cookies are session cookies, but some remain on your device for a period of 12 months or until they are deleted;
Google Analytics	Google	This tool enables the collection of statistical data on the manner in which the Website is used by Customers, m.in. the number of visits, the duration of visits, the search engine used, and the location. The collected data helps to improve the Website and make it more customer-friendly.	up to 2 years or until they are deleted (whichever occurs first)
Facebook Pixel	Facebook	This tool makes it possible to determine that you have visited the Website, as well as to direct advertisements displayed on Facebook and Instagram social networks to you and to measure their effectiveness.	up to 3 months or until they are removed (whichever occurs first)

7. Through most used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation by the Website in the future. Disabling or limiting the use of cookies may, however, cause quite serious difficulties in using the Website, e.g. in the form of a longer loading time of the Website page and restrictions on the use of certain functionalities.

Final provisions

To the extent not regulated by the Policy, generally applicable provisions on the protection of personal data shall apply.

The policy is effective from 12.03.2024.