PRIVACY POLICY
www.tablehop.org

§ 1 General provisions

1. The Administrator of the personal data of users of the website located under the domain www.tablehop.org is TABLEHOP LIMITED LIABILITY COMPANY, with its registered office at: ul. Augustyna Szamarzewskiego 21/2, 60-514 Poznań, entered in the Register of Entrepreneurs kept by the District Court Poznań – Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register, under KRS number: 0001198626, NIP: 7812097341, REGON: 542931049 (hereinafter referred to as the "Administrator").
2. The Administrator has designated an electronic contact point intended for direct communication with the authorities of the Member States, the Commission, and the Digital Services Board: contact@tablehop.org. The same channel may also be used by Users for quick and direct contact with the Administrator. It is also possible to contact the Administrator in writing at the correspondence address indicated above.
3. Communication may take place in Polish or English.
4. The purpose of this Policy is to define the activities undertaken with respect to personal data collected via the Administrator's website and related services and tools used by its users, as well as within the scope of concluding and performing contracts in contact outside the website.
5. If necessary, the provisions of this Policy may be amended. The amendment will be communicated to users by publishing the new content of the Policy, and in the case of a database of persons who have consented to the processing of data by e-mail or have provided e-mail data in connection with the performance of contracts, they will also be notified of the amendment by e-mail 14 days before the new policy enters into force.

§ 2 Legal grounds for processing, purposes and storage of personal data

1. Users' personal data are processed in accordance with the General Data Protection Regulation, the Act on Personal Data Protection, the Act of 10 May 2018 on Personal Data Protection, and the Act of 18 July 2002 on the Provision of Electronic Services, as amended, and for the purposes of making a notification pursuant to Article 16(1) of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act) (OJ EU L 2022.277.1, as amended; "DSA"), also on the basis of Article 3(h) DSA.
2. The Administrator may collect the following data for the following purposes:

Purpose of data processing	Legal basis for processing	Data retention period	Scope of processed data
Performance of a contract with the Client or taking actions at the request of the data subject prior to the conclusion of the above-mentioned contracts	Article 6(1)(b) GDPR (performance of a contract)	• for the duration of the contract • until expiry of accounting obligations • until expiry of the period during which claims may be asserted	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • company name • tax identification number (NIP)

Purpose	Legal basis	Retention period	Scope of data
Marketing	Article 6(1)(a) GDPR (consent)	• until withdrawal of consent • until expiry of the period during which claims may be asserted • until unsubscribing from the newsletter	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country)
Sending notifications to the Client	Article 6(1)(b) GDPR (performance of a contract or pre-contractual actions)Article 6(1)(c) GDPR (legal obligation)	• 5 years after termination of business relations with the Client	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • business entity data • data concerning activities performed by the User within the Service
Expression of an opinion by the Client	Article 6(1)(a) GDPR	• until deletion of the opinion or acceptance of an objection • until expiry of the period during which claims may be asserted	• first and last name • e-mail address • telephone number
Keeping accounting records	Article 6(1)(c) GDPR in conjunction with tax and accounting regulations	• until expiry of the period during which claims may be asserted • for the period required by tax law or accounting law (generally 5 years)	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name
Establishment, assertion or defence of claims	Article 6(1)(f) GDPR (legitimate interest)	• for the duration of the legitimate interest • no longer than the limitation period for claims	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name
Conducting research and analyses to improve services	Article 6(1)(f) GDPR (legitimate interest)	• until expiry of the period during which claims may be asserted • until expiry or deletion of analytical cookies	• company name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • computer components • settings • installed software
Registration of a Client account	Article 6(1)(b) GDPR (performance of a contract or pre-contractual actions)	• 5 years after termination of business relations	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • business entity data
Ensuring customer service	Article 6(1)(b) GDPR (performance of a contract or pre-contractual actions)	• 5 years after termination of business relations • 2 years after last update of the Client's inquiry	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • business entity data

Proper functioning of the service	Article 6(1)(f) GDPR (legitimate interest)	• 5 years after termination of business relations	• data as above • information on activities within the service (clicks, visit duration, read notifications, etc.)
Enabling password reset	Article 6(1)(f) GDPR (security and legitimate interest)	• 5 years after termination of business relations	• first and last name • e-mail address • business entity data • Client password • user ID
Supervision of compliance with regulations and policies	Article 6(1)(f) GDPR (legitimate interest)	• 5 years after termination of business relations	• transaction data • business entity data
Handling requests concerning personal data	Article 6(1)(c) GDPR (legal obligation)	• for the duration of the legitimate interest • no longer than the limitation period for claims	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name
Providing information to law enforcement and public authorities	Article 6(1)(c) GDPR (legal obligation)	• for the duration of the legitimate interest • no longer than the limitation period for claims	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name
Fulfilment of obligations under Article 16 DSA (handling illegal content notices)	Article 6(1)(c) GDPR (legal obligation)	• until notification of the decision • until notification of the right to appeal	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name
Processing required by proceedings before public authorities	Article 6(1)(c) GDPR (legal obligation)	• for the duration of such obligation	• first and last name • e-mail address • telephone number • address (street, building number, apartment number, postal code, city, country) • NIP • company name

3. The Administrator may use profiling for direct marketing purposes, but decisions taken by the Administrator on its basis do not concern the conclusion or refusal to conclude a contract or the possibility of using electronic services.
4. To the extent necessary for the proper functioning of the website and its functionalities, the website may, while being used by the User, collect other information, including in particular:
    a) IP address;
    b) information about the device, hardware and software, such as hardware identifiers, mobile device identifiers (e.g. Apple Identifier for Advertising ("IDFA") or Android Advertising ID ("AAID"));
    c) type of platform;
    d) settings and components;

e) data concerning the web browser, including browser type and preferred language;

5. Taking into account the nature, scope, context and purposes of processing as well as the risk of infringement of the rights or freedoms of natural persons of varying likelihood and severity, the Administrator implements appropriate technical and organisational measures to ensure that processing is carried out in accordance with the Regulation and to be able to demonstrate this. These measures are reviewed and updated as necessary. The Administrator applies technical measures preventing the acquisition and modification of personal data transmitted electronically by unauthorised persons.

§ 3 Disclosure of data

1. The Administrator ensures that all collected personal data are used to fulfil obligations towards users. Such information will not be disclosed to third parties except where:
   a) the explicit consent of the data subjects has been previously given, or
   b) the obligation to transfer such data arises or will arise from applicable legal provisions, e.g. to law enforcement authorities.
2. Additionally, personal data of service recipients and clients may be transferred to the following recipients or categories of recipients:
   a) service providers supplying the Administrator with technical, IT and organisational solutions enabling the Administrator to conduct business activity, including the website and electronic services provided through it (in particular software providers, marketing agencies, e-mail and hosting providers, business management software providers and technical support providers, as well as product delivery operators) – the Administrator transfers collected personal data of the Client to a selected provider acting on its behalf only where and to the extent necessary to achieve a given data processing purpose in accordance with this privacy policy;
   b) accounting, legal and advisory service providers providing the Administrator with accounting, legal or advisory support (in particular accounting offices, law firms or debt collection companies) – the Administrator transfers collected personal data of the Client to a selected provider acting on its behalf only where and to the extent necessary to achieve a given data processing purpose in accordance with this privacy policy;
   c) payment gateway and payment processing solution providers – the Administrator transfers collected personal data of the Client to a selected provider acting on its behalf only where and to the extent necessary to achieve a given data processing purpose in accordance with this privacy policy.
3. The Administrator may disclose anonymised data (i.e. data that do not identify specific Users) to external service providers in order to better assess the attractiveness of advertisements and services for users; in this respect, due to the registered offices of software providers, data may be transferred – while maintaining data protection principles – to third countries which ensure standards of contractual provisions approved by the European Commission for personal data processing or which have appropriate authorisation to do so on the basis of bilateral data processing agreements between the European Union and the given third country, which is not a member of the European Economic Area. In the case of the Administrator, these entities are:
   - Google LLC (registered office: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) for Google Analytics tools used to analyse website statistics, Google Tag Manager used to manage scripts by easily adding code snippets to a website or application and tracking actions performed by users on the

website, Google Ads used to display sponsored links in Google search results and on websites cooperating under the Google AdSense programme, Google Workspace enabling comprehensive website editing and coordination of work of persons working on it (including Google Drive, Gmail, Google Sheets, Google Forms, Google Looker Studio);

- <u>Meta Platforms, Inc.</u> (registered office: 1601 Willow Road, Menlo Park, CA 94025, USA) for pixel technology used to track conversions from advertisements, optimise them based on collected data and statistics, and build audience lists targeted for future advertisements;
- <u>Hotjar Limited</u> (registered office: Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville, St Julian's STJ 3141, Malta) for analytical tools used to analyse website statistics and track actions performed by users on the website;

4. The Administrator continuously conducts risk analysis to ensure that personal data are processed in a secure manner – ensuring in particular that access to data is granted only to authorised persons and only to the extent necessary for the performance of their tasks. The Administrator ensures that all operations on personal data are recorded and performed only by authorised employees and collaborators.

5. The Administrator takes all necessary measures to ensure that its subcontractors and other cooperating entities also provide guarantees of applying appropriate security measures in every case where they process personal data on behalf of the Administrator.

6. The Administrator's website may use Google Analytics, a web analytics service provided by Google LLC ("Google"). Google Analytics uses cookies to help website operators analyse how visitors use the website. Information generated by cookies regarding visitors' use of the website is usually transmitted to Google and stored on servers in the United States. In accordance with current IT standards, IP addresses of users visiting the Administrator's website are shortened. Only in exceptional cases is the full IP address transmitted to a Google server in the United States and shortened there. On behalf of the Administrator, Google will use this information to evaluate the website for its users, compile reports on website traffic, and provide other services related to website traffic and internet usage for website operators. Google will not associate the IP address transmitted as part of Google Analytics with any other data held by Google. More information on how Google Analytics collects and uses data can be found on Google's official website at: www.google.com/policies/privacy/partners. In addition, each User may prevent the collection and processing of data concerning their use of the website by Google by downloading and installing the browser plug-in available at: http://tools.google.com/dlpage/gaoptout.

7. When disclosing data to third parties, the Administrator makes every effort to ensure that such disclosure is made only to entities meeting the criteria and requirements set out in Articles 46 or 49 GDPR. Where appropriate, the Administrator will rely on EU standard contractual clauses and other safeguards to enable transfers outside the EEA. In accordance with the judgment of the Court of Justice of the European Union of 16 July 2020, the Administrator continues to assess the legal systems of the countries to which data are transferred and, where necessary, updates measures aimed at ensuring adequate levels of protection.

8. With regard to data transferred to the United States, the Administrator, when disclosing data to third parties, makes every effort to ensure that this is done, in accordance with the European Commission decision of 10 July 2023, only to entities and organisations in the USA that ensure compliance with the new "EU–US Data Privacy Framework". The list of such organisations has been published by the U.S. Department of Commerce. The transfer of personal data from the EEA to organisations that have

joined the "EU–US Data Privacy Framework" and are included on this list is possible without the need to obtain additional authorisations or apply legal instruments such as standard contractual clauses or binding corporate rules. However, where a given data importer in the USA has not joined the "EU–US Data Privacy Framework", the transfer of personal data to such importer is possible and will take place upon fulfilment of the conditions set out in Articles 46 or 49 GDPR. In such cases, the Administrator will rely on EU standard contractual clauses and other safeguards to enable transfers outside the EEA.

9. Due to the fact that the Service provides its services exclusively within the territory of the Member States of the European Union and the United Kingdom of Great Britain, the Service's website is not available outside this area, does not provide services beyond the above-mentioned territory, and therfore it is not possible, through the Service's website, to participate in Courses or other offerings available on it. Data collected through the Service's website shall also be processed exclusively within the above-mentioned territory, subject to the exceptions described in this Privacy Policy.

§ 4 User rights

1. A User whose personal data are processed has the right to:
   a) access, rectification, restriction, erasure or portability – the data subject has the right to request from the Administrator access to their personal data, rectification, erasure ("right to be forgotten") or restriction of processing, as well as the right to object to processing and the right to data portability. Detailed conditions for exercising the above rights are set out in Articles 15–21 GDPR;
   b) withdrawal of consent at any time – where the data subject's data are processed by the Administrator on the basis of consent (pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR), the data subject has the right to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal;
   c) lodging a complaint with a supervisory authority – the data subject has the right to lodge a complaint with a supervisory authority in the manner and procedure specified in GDPR and Polish law, in particular the Act on Personal Data Protection. The supervisory authority in Poland is the President of the Personal Data Protection Office in Warsaw;
   d) objection – the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them based on Article 6(1)(e) (public interest or public task) or (f) (legitimate interests of the administrator), including profiling based on those provisions. In such a case, the Administrator shall no longer process such personal data unless it demonstrates compelling legitimate grounds for the processing overriding the interests, rights and freedoms of the data subject or grounds for the establishment, exercise or defence of legal claims;
   e) objection to direct marketing – where personal data are processed for direct marketing purposes (based on the Administrator's legitimate interest, not on the consent of the data subject), the data subject has the right to object at any time to the processing of personal data concerning them for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing.
2. The exercise of the above rights takes place on the basis of a request sent to the Administrator's e-mail address. Such a request should contain the user's first and last name.

3. The User declares that the data provided or published by them on the website are correct.

§ 5 Cookies

1. "Cookies" shall mean IT data, in particular text files, stored on users' end devices (usually on a computer's hard drive or a mobile device) used to store specific settings and data by the user's browser in order to use websites. These files allow the user's device to be recognised and the website to be displayed accordingly, ensuring comfort during its use. Storing "cookies" therefore enables appropriate preparation of the website and offer according to user preferences – the server recognises and remembers, inter alia, preferences such as visits, clicks and previous actions.
2. "Cookies" contain in particular the name of the domain of the website from which they originate, the time of storage on the end device, and a unique number used to identify the browser from which the connection to the website is made.
3. "Cookies" are used for the purpose of:
    a) adapting website content to user preferences and optimising the use of websites;
    b) creating anonymous statistics which, by helping to determine how users use websites, enable improvement of their structure and content;
    c) providing website users with advertising content tailored to their interests.
4. "Cookies" are not used to identify users and their identity is not determined on their basis.
5. The basic division of "cookies" is their distinction into:
    a) necessary cookies – absolutely necessary for the proper functioning of the website or functionalities the user wishes to use, as without them many services we offer could not be provided. Some of them also ensure the security of electronic services provided by us;
    b) functional cookies – important for the operation of the website because they:
        • enhance website functionalities; without them the website will function properly but will not be adapted to user preferences,
        • ensure a high level of website functionality; without them the level of website functionality may be reduced, but their absence should not prevent full use of the website,
        • serve most website functionalities; blocking them will cause selected functions to not work properly;
    c) cookies used to configure websites – enabling settings of functions and services on websites;
    d) cookies used for website security and reliability – enabling authentication verification and optimisation of website performance;
    e) cookies used for authentication – enabling information that the user is logged in, so that the website can display appropriate information and functions;
    f) cookies examining session status – enabling saving of information on how users use the website, which may concern most frequently visited pages or error messages displayed on certain pages; cookies used to store the so-called "session state" help improve services and browsing comfort;
    g) cookies examining processes occurring on the website – enabling efficient operation of the website and its available functions;
    h) cookies conducting analyses, research or audience measurement audits – enabling website owners to better understand user preferences and, through analysis, improve and develop products and services. Usually, the website

owner or a research company collects information anonymously and processes data on trends without identifying personal data of individual users.

6. The use of "cookies" to adapt website content to user preferences does not generally involve the collection of any information enabling user identification, although such information may sometimes constitute personal data, i.e. data enabling certain behaviours to be attributed to a specific user. Personal data collected using "cookies" may be collected solely for the purpose of performing specific functions for the user. Such data are encrypted in a manner preventing access by unauthorised persons.

7. Cookies used by this website are not harmful either to the user or to the end device used by them; therefore, for the proper functioning of the service, it is recommended not to disable their handling in browsers. In many cases, software used to browse websites (web browser) by default allows the storage of information in the form of "cookies" and other similar technologies on the user's end device. The User may change the way "cookies" are used by the browser at any time. To do so, browser settings should be changed. The method of changing settings varies depending on the software (web browser) used. Relevant instructions can be found on subpages depending on the browser used.

8. "Cookies" are also used to facilitate logging into the user account, including via social media, and to enable navigation between subpages without the need to log in again on each subpage. At the same time, "cookies" are used to secure websites, e.g. to prevent access by unauthorised persons.

9. The Administrator may use internet log files (containing technical data such as the user's IP address) to monitor traffic within its services, resolve technical problems, detect and prevent fraud, and enforce the provisions of the User Agreement.

10. Detailed information on changing cookie settings and deleting them independently in the most popular web browsers is available in the browser's help section and on the following websites (just click the relevant link):
    a) Google Chrome
    b) Mozilla Firefox
    c) Microsoft Edge
    d) Opera
    e) Safari macOS
    f) Safari iOS/iPad OS

11. Detailed information on managing cookies on a mobile phone or other mobile device should be available in the user manual of the given mobile device.