

# **PRIVACY POLICY**

## **Minerva Technology SP. Z O.O.**

### **("Privacy Policy")**

#### **1. Introduction**

In order to ensure a high standard of communication and transparency of the activities of Minerva Technology Sp. z o.o. ("**Minerva Technology**") on the Internet and in accordance with applicable regulations, we present our rules for processing your information (both personal data and data not subject to this regime) through our websites.

This Privacy Policy describes Minerva Technology's model of operation as a website administrator in the context of the technologies used, including cookies (this issue is described in more detail in Minerva Technology's Cookie Policy), the provision of electronic services, and the processing of personal data of users of our websites.

#### **2. Which Minerva Technology websites does this Policy apply to?**

This Privacy Policy applies to the website administered by Minerva Technology at  
administered by Minerva Technology at <https://www.useminerva.com/>

#### **3. Collection of personal data by Minerva Technology**

As a rule, Minerva Technology does not knowingly process the personal data of users of its website until you decide to provide us with personal data. Until that moment, we collect information about your interaction with websites, content, and services, such as:

- a) anonymous website user ID,
- b) information about the device and login (so-called system logs), which contain data such as: date of visit to the website, IP address from which you connected to the website,
- c) data on website viewing statistics (we use capping, for example – we count the number of views of our websites),
- d) data on traffic to and from individual pages,
- e) data and metadata about the web browser you use.

Collecting this information allows us to continuously improve our websites and make them more user-friendly. Based on this data, we can create website performance reports and draw conclusions about your interests in specific content. However, we do not personalize the content that is displayed to you on our websites.

At the same time, we emphasize that the data stored in Minerva Technology server logs is not associated with specific users and is not used by us to identify individual users, unless you decide to contact us, e.g., via contact forms.

When a user of the website uses the contact form, registers on the website or in the application, sends us their own materials, or submits a complaint in connection with a specific service provided by us electronically, your personal data is sent to our servers, which may sometimes be supplemented with data read from cookies. For example: if you contact us in connection with a technical problem with the use of our website, in order to solve your problem, it may be necessary for us to use, for example, data from your web browser or information about the date and time you logged into the website.

As a rule, if you decide to contact us via the contact form, we collect the following personal data:

- 1) name or nickname,
- 2) e-mail address,
- 3) phone number,
- 4) other unstructured personal data that you provide to us on your own initiative initiative.

Registration in applications administered by Minerva Technology requires you to provide your email address and define the business entity you represent or with which you are registering an account with us. Regulations concerning this stage are presented and agreements are concluded separately.

In order to consider your complaint or other request arising from the contract for the provision of electronic services, we need to obtain at least the following personal data:

- 1) contact details – email address or first name, last name, mailing address,
- 2) any personal data necessary for you to describe the subject matter and justification of the complaint.

#### **4. For what purposes and on what legal basis does Minerva Technology process the personal data of website users?**

We process your personal data on the basis of:

- 1) Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 ("GDPR") – for the purpose of concluding and performing the contract for the provision of electronic services concluded between you and us (you conclude it by accepting the terms and conditions, including by using

website), in particular for the purpose of handling complaints and other requests relating to the services we provide;

- 2) Article 6(1)(f) of the GDPR – as part of our legitimate interest, which consists of: direct marketing of Minerva Technology services, contacting you, analyzing your use of the website, as well as ensuring the security of the websites, e.g. by eliminating suspicious network traffic;
- 3) national law on the protection of personal data and the provision of electronic services.

## **5. What tools do we use to operate our websites and applications?**

The websites we administer use the following tools:

- 1) Google Analytics, which allows us to analyze statistics on visits to our websites,
- 2) Google Tag Manager, which enables us efficient manage tags, monitor online advertising campaigns.
- 3) Cookiebot – for managing consent to the processing of data in cookies that go beyond what is necessary.

## **6. Recipients of personal data of Minerva Technology website users**

In order to provide high-quality services, Minerva Technology uses subcontractors, e.g. for technical support of the website or communication with you. In specific cases, these entities may have access to the personal data we process. In such cases, Minerva Technology entrusts these entities with the processing of your personal data in accordance with our security standards.

## **7. Processing of personal data by Minerva Technology and publication of content hosted on external servers**

We use social media plugins - LinkedIn. After using the plugin (link), you will be redirected to websites that are not administered by Minerva Technology and for which we are not responsible. In such cases, we encourage you to read the information on personal data processing and cookie policies posted on the websites to which the plugins and links lead.

## **8. Profiling of personal data and automated decision-making**

Minerva Technology does not profile your personal data and does not use so-called automated decision-making when an unregistered user uses the website.

## **9. Retention periods for user information and personal data of Minerva Technology websites**

The period for which Minerva Technology, as the website administrator, stores specific data depends on the type of data and the purpose for which it is processed. In the case of personal data obtained by us in connection with the performance of contracts concluded with you (in particular in the event of a complaint submitted by you), this period will most often be the limitation period for any claims arising from the legal relationship in question.

If you create an account on the website, your personal data will be processed by us in accordance with the rules applicable to the provision of contractual services.

## **10. Security**

All data collected by Minerva Technology is processed and stored using security measures appropriate to the risks we have identified and in accordance with the requirements of the law. For example, on websites where we use contact forms or give you the option to create accounts and log in, we use encrypted HTTPS protocols.

At the same time, we would like to draw your attention to the dangers of sharing your login details with third parties and failing to log out of websites after using them.

## **11. Rights of Minerva Technology website users**

You have the following rights:

- 1) the right to request Minerva Technology to provide access to your personal data  
the right to request Minerva Technology to correct your personal data
- 2) the right to request Minerva Technology to rectify your personal data
- 3) the right to request Minerva Technology to delete your data,
- 4) the right to request Minerva Technology to restrict the processing of your personal data,
- 5) the right to object to  
concerning your personal data,
- 6) the right to request the transfer of your personal data.

Please send the above requests to [hello@useminerva.com](mailto:hello@useminerva.com)

You also have the right to lodge a complaint with the supervisory authority responsible for personal data protection, i.e. the President of the Data Protection Authority.

## **12. Processing of children's personal data**

The services offered by Minerva Technology are intended for adults (as expressly stated in the terms and conditions of our websites). Consequently, Minerva Technology does not knowingly or intentionally process the personal data of children.

## **13. Changes to the Privacy Policy**

The current version of this Privacy Policy will always be available to you in the footer of our websites.