## Privacy & Cookies Policy

#### I. Introduction

This Privacy Policy contains information on the processing of personal data and the use of cookies by:

Platform Operator – SYDRON Sp. z o.o., with its registered office in Rzeszów, Jana i Jędrzeja Śniadeckich 20D / 7, 35-006 Rzeszów, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Rzeszów, XII Commercial Division of the National Court Register under KRS number : 0001027177, REGON: 524825960, NIP: 8133895595, with a share capital of PLN 5,000.00.

II. Purpose of the privacy policy

The Privacy Policy is made available in order to provide persons whose personal data are processed by the Administrator with the widest possible information about the scope of processed data, the methods and principles of data processing and the rights of these persons.

The basic legal regulation concerning the protection of personal data is 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 (GDPR).

III. Obligation to read the policy

Each user is obliged to read this policy before using the Platform.

By using the Platform, the user declares that he or she agrees to the manner in which the Administrator collects, collects, stores, uses and protects personal data.

IV. Glossary of terms

The following expressions are given the following meanings:

- Administrator it ought to be understood as SYDRON Sp. z o.o., with its registered office in Rzeszów, Jana i Jędrzeja Śniadeckich 20D / 7, 35-006 Rzeszów, entered into the National Court Register under KRS number : 0001027177, REGON: 524825960, NIP: 8133895595.
- 2. Platform it should be understood as a website operating at the address of <u>PulsePower</u>, run by the Administrator.
- 3. Cookies text files placed by the server on the user's device, which are stored on the user's end device and intended for the use of the Platform. They are used, m.in

others, to analyse traffic, personalise content and ensure the functionality of the website.

- 4. Personal Data it should be understood as any information about an identified or identifiable natural person, such as name, surname, e-mail address, IP address, telephone number, online identifier.
- 5. Order Form an interactive form available on the Platform, through which the User indicates the data necessary to conclude a sales contract and ship the ordered products.
- 6. Client it should be understood as a natural person or an entrepreneur using the Platform in order to purchase products.
- 7. Browser an IT program that allows you to browse websites, e.g. Google Chrome, Mozilla Firefox, Safari.
- 8. Third country it should be understood as a country outside the European Economic Area (EEA).
- 9. GDPR Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of personal data and on the free movement of such data.
- 10. Processing any operation performed on personal data, such as collection, storage, modification, consultation, access, restriction, deletion or destruction.
- 11. Profiling any form of automated processing of personal data consisting in their analysis or use to forecast user preferences.
- 12. Platform Terms and Conditions terms and conditions defining the rules of using the Platform, available at <u>PulsePower</u>.

## V. Application Scope

This Privacy Policy describes the rules for the processing of Personal Data in connection with the use of the Platform by the Users, the provision of Services by the Administrator available to the Users through the Platform, or in order to establish contact and provide additional services.

VI. Transfer of personal data

The Administrator may obtain Personal Data directly from Users (i.e. data provided when using the Platform, filling in forms available on the Platform, as well as through telephone contact, e-mail or other form of communication).

The Administrator may also process Personal Data obtained from other entities with appropriate legal authorization, e.g. from a person authorized to represent the User or other persons indicated by the User as persons performing the Agreement or cooperation agreement.

The categories of data processed by the Administrator have been specified in the section Scope and purposes of personal data processing.

#### VII. Data processed by the Administrator

The scope of personal data processed by the Administrator may vary depending on the type of Services and functionalities used by the User. This data is collected directly from the User or indirectly as part of the use of the Platform.

# 1. Data collected during the registration of the Account and the performance of the Agreement

When creating an Account on the Platform, the User provides the necessary data required to use the Services:

- Natural persons (Consumers, Entrepreneurs-Consumers) name, surname, e-mail address, telephone number.
- Companies (Entrepreneurs, Sellers, Manufacturers, Trade Operators) company name, registered office address, NIP (Tax Identification Number), REGON (National Business Registry Number), name and surname of the person authorized to create an Account, e-mail address, telephone number.

In addition, after completing the registration process, the User may voluntarily provide other data in order to complete the profile.

## 2. Data processed as part of the provision of paid Services and cooperation agreements

In the case of concluding a cooperation agreement with the Manufacturer, Seller or Trade Operator, the Administrator may process the data necessary for the implementation of paid Services and issuing settlement documents:

- Name and surname of the persons representing the User,
- Contact details (e-mail, phone),
- Address
- Data required to issue invoices or other accounting documents.

Providing this data is necessary for the performance of the contract and tax obligations.

## 3. Data related to communication with the Administrator

When the User contacts the Administrator via:

- Contact forms on the Platform,
- E-mail or phone, the Administrator processes the data provided in the application, e.g. name, surname, e-mail, content of the message.

In the case of telephone conversations, conversations may be recorded – only after obtaining the User's consent.

The Controller also maintains profiles in social media (Facebook, Instagram, LinkedIn), where it can process the User's data, but has no influence on the rules of data processing by these platforms.

## 4. Data processed as part of the complaint and withdrawal procedure

In the event of filing a complaint or exercising the right to withdraw from the Agreement, the Administrator may process:

- Name, surname, e-mail, address of residence/registered office,
- Content of the complaint form,
- Data contained in the additional documentation regarding the complaint.

Providing this data is voluntary, but necessary to carry out the complaint procedure.

## 5. Data processed as part of the Newsletter subscription

If the User subscribes to the Newsletter, the Controller processes:

- Your email address,
- Interaction information (whether the email was opened, links clicked),
- IP address and time of subscription listing.

The User may unsubscribe from the Newsletter at any time.

## 6. Analytical and statistical data

The Administrator collects data on the activity of Users on the Platform, e.g.:

- Number of visits, clicks, time spent on the site,
- Device and browser type,
- Preferences for the content you view.

This data is used to optimize the operation of the Platform and improve the quality of the Services.

## 7. Data used in marketing activities

In order to personalize advertising content, the Administrator may process:

- Contact details (e-mail, phone),
- Browsing history information,
- Data about interactions with ads,
- Location information (with your consent).

Marketing can include contextual advertising and personalized offer notifications.

#### 8. Location Data

With the User's consent, the Administrator may process the geolocation data of the device in order to:

- Matching offers to the User's location,
- Provide access to location-based features.

You can turn off location access at any time in your device's settings.

## 9. Data processed as part of social media

The Administrator may process the data of Users using social plugins (e.g. Facebook, Instagram). By using these features, you agree to the privacy policy of the respective platform.

#### 10. Period of data processing

After the expiry of the processing period, the data is deleted or anonymized. The retention periods are adapted to the applicable laws and, in the case of your consent, until you withdraw your consent.

VIII. Recipients of personal data

- 1. The Administrator informs that in connection with the provision of Services, Users' personal data may be disclosed to the following entities:
  - Technology partners supporting the operation of the Platform, including Vercel Analytics (more information: Vercel Analytics),
  - Entities providing hosting and infrastructure services for the Platform,
  - Providers of analytical and advertising tools, if the User has consented to the processing of data for marketing purposes,
  - State authorities, if it results from the applicable law.
- 2. The Administrator ensures that the transfer of personal data to external recipients takes place in accordance with applicable law and only to the extent necessary.

IX. Data Processing in Third Countries

Users' personal data is not transferred outside the European Economic Area (EEA). If such a need arises in the future, the Controller will implement appropriate data protection mechanisms, in accordance with the provisions of the GDPR.

- X. Automated decision-making and profiling
  - 1. The Controller may use personal data for automated decision-making, including profiling for marketing purposes.
  - 2. Profiling is based on the User's activity on the website, analysis of preferences and interaction with the Platform.
  - 3. The User may withdraw their consent to profiling at any time by contacting the Administrator.

## XI. User rights

In accordance with the provisions of the GDPR, the User has the right to:

- 1. Access your personal data and receive a copy of it.
- 2. Correct, update or correct data.
- 3. Erasure of the data ("right to be forgotten") if the data is no longer necessary for the purposes of the processing.
- 4. Restriction of data processing in certain cases.
- 5. Object to the processing if it is carried out on the basis of the legitimate interest of the Administrator.
- 6. Transfer data to another entity.
- 7. Withdraw your consent to the processing of your data at any time.

In order to exercise the above rights, the User may contact the Administrator.

## XII. Cookies and Analytical Tools

- 1. The Controller uses cookies to improve the functioning of the Platform, including traffic analysis and content optimisation.
- 2. Vercel Analytics is used to monitor user behavior on the website. You can find more information about this tool here: Vercel Analytics.
- 3. The User can manage the cookie settings in their browser and by using the consent banner available on the Platform.

## XIII. Contact details

In case of questions regarding the protection of personal data, the User may contact the Administrator:

• Email: <u>info@pulsepower.com.ua</u>

 Postal address: SYDRON Sp. z o.o., Jana i Jędrzeja Śniadeckich 20D/7, 35-006 Rzeszów, Poland.

XIV. Changes to the Privacy Policy

The Administrator strives to ensure that this Policy is up-to-date and updated on an ongoing basis. In the event of changes to:

- Law
- Guidelines of supervisory authorities,
- Technologies used,
- Purposes and methods of data processing,

The Administrator will make appropriate updates to this Policy. Users will be informed of any significant changes by e-mail or by a message on the website when logging in for the first time after the changes have been made.