

PRIVACY POLICY

effective as of 29.09.2022

Kempuri cares about privacy and makes every effort to ensure the security and confidentiality of the personal data of the users (the "**Users**") of <http://kempuri.com> website ("**Website**") when they visit the Website, contact us by phone, via e-mail, contact forms or visit our social media.

This Privacy Policy provides the Users with essential information on their personal data processing, in particular: (i) type of the User's personal data processed, (ii) purposes and legal basis for processing of Users' personal data, (iii) manner of using the personal data and (iv) rights available to the Users (the "**Privacy Policy**").

The User's personal data are always processed in compliance with the applicable laws, including in particular, the Regulation of the European Parliament and of the Council 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**").

[DATA CONTROLLER AND OWNER]

The personal data Controller is Kempuri spółka z o.o. (limited liability company) with its registered office in Warsaw, at ul. Postępu 15, 02-676 Warsaw, Poland, entered in the National Court Register under KRS no. 0000982273, tax id. no. (NIP) 5213977856, statistical no. (REGON) 52266391400000 (the "**Controller**" or "**Kempuri**"). Contact address for the Users: legal@kempuri.com; data subjects may also contact Kempuri otherwise, as preferred.

[TYPES OF PERSONAL DATA]

Among the types of personal data that this Website collects or that are collected through this Website (the "**Personal Data**") there are:

- **Cookies and Usage Data**, where Cookies are defined in the Cookie Policy, which constitutes an integral part of this Privacy Policy; Usage Data is information collected automatically through this Website (or third party services engaged in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website) and the details about the path followed within the Website with particular reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.
- **Other Personal Data** described in other sections of this Privacy Policy.

The Personal Data may be freely provided by the User or collected automatically when using this Website. Any use of the Cookies - or of other tracking tools - by this Website or by the owners of third party services used by this Website, unless stated otherwise, serves to identify Users and remember their preferences to provide the service required by the User. Failure to provide specific Personal Data may make it impossible for this Website to provide its services. Users are responsible for any Personal Data of third parties obtained, published or shared through this Website and confirm that they had previously obtained the third party's consent to provide the Data to the Controller.

[USE OF PERSONAL DATA]

The Personal Data concerning the User are collected to allow the Controller to provide its services to the User. The Personal Data used for each purpose are outlined in the specific sections of this document. Users' Personal Data are collected for the following purposes and on the following legal basis:

▪ Correspondence via Contact Form:

Personal Data collected via Contact form:	name, e-mail, and message content.
Purpose:	to provide a message or query to the Controller and receive the reply from the Controller.
Basis for processing:	The Controller's legitimate interests (Art. 6.1.f of the GDPR) consist in communicating with an individual who requests the Controller to provide an answer.

The correspondence may be exchanged for many reasons which are hard to categorize. The messages may be sent as a result of existing or possible contracts, technical advice, financial settlements, etc.

▪ Recruitment process and future recruitment processes via Careers Join Us Form:

Personal Data collected via Join Us Form:	name, surname, e-mail, CV and its content, phone, salary expectations, contract type, city
Purpose:	to recruit the candidate (" Candidate ") and / or conclude or perform the agreement with the Candidate
Basis for processing:	<ul style="list-style-type: none">▪ Controller's legal obligations resulting in particular from Art. 22 [1] of the Labor Code (Art. 6.1.c of the GDPR) – in case of current recruitments;▪ activities undertaken at Candidate's request, before the conclusion of an agreement and to perform an agreement (Art. 6.1.b of the GDPR);▪ consent of the Candidate (Art. 6.1.a of the GDPR) – in case of other recruitment data and for future recruitment processes.

The provision of the Candidates' Personal Data is a statutory requirement and is necessary for an agreement to be concluded; if they are not provided, it shall be impossible to conclude an agreement. In the case of other recruitment data and for future recruitment processes the consent may be withdrawn at any time – without affecting the lawfulness of processing prior to the withdrawal.

▪ Activities prior to the conclusion of an agreement, commercial and marketing information:

Personal Data collected:	name, surname, company, e-mail, phone number, customer needs.
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Purpose:	to conclude and perform the contract for the provision of the services, draft and provide the offer, provide commercial and marketing information
Basis for processing:	<ul style="list-style-type: none"> ▪ taking up activities, at the User's request, prior to the conclusion of an agreement (e.g. to submit an offer) and to perform the agreement (Art. 6.1.b of the GDPR); ▪ consent of a data subject (Art. 6.1.a of the GDPR) – in case of providing commercial and marketing information; ▪ pursuit of the Controller's legitimate interests (Art. 6.1.f of the GDPR), consisting in carrying out direct marketing activities – in case of direct marketing.

Providing personal data is necessary for an agreement to be concluded; if they are not provided, it shall be impossible to conclude an agreement. For the purpose of commercial and marketing information, the Controller contacts the Users who have provided their e-mail address and/or phone number for this purpose. Personal Data are provided voluntarily. The User may withdraw their consent at any time – without affecting the lawfulness of the processing before the withdrawal.

- **Pursuit of and protection against legal claims, fraud prevention, statistics and analytics, ensuring ICT environment security, application of internal control systems, and financial settlements:**

Personal Data collected:	Cookie and Usage data, claims data, fraud prevention data, security data, internal control data, and financial data.
Purpose:	to protect against legal claims in court or out of court, prevent fraud, for statistics and analytics, visualization service, to ensure ICT environment security, to apply internal control systems, for financial settlements.
Basis for processing:	<ul style="list-style-type: none"> ▪ pursuit of the Controller's legitimate interests (Art. 6.1.f of the GDPR) in protection against legal claims, fraud prevention, statistics and analytics, visualization service, ensuring ICT environment security, application of internal control systems; ▪ compliance with the Controller's legal obligations resulting in particular from accounting policies and tax-related regulations (Art. 6.1.c of the GDPR) – in case of financial settlements.

Personal Data may be used for legal purposes by the Controller. Google Analytics is a web analysis service provided by Google Inc. (Google). Google utilizes the Personal Data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the Personal Data collected to contextualize and personalize the ads of its own advertising network. Google Fonts is a typeface visualization

service provided by Google that allows the Website to incorporate content of this kind on its pages.

[RECIPIENTS OF PERSONAL DATA]

Personal Data may be processed by the Controller's service providers rendering, among others, financial settlements, legal, advisory, consulting, audit, marketing, archiving, IT, courier, and postal services. A subset of Candidate's data may be shared with a partner company if a Candidate agrees. The updated list of these recipients may be requested from the Controller at any time. The Users' Personal Data shall not be shared with any other third parties, unless this proves necessary and the User consents thereto or a data disclosure obligation result from mandatory rules of law, a final and non-appealable court judgment or a final decision of a public authority. On the Website, there can be references to other webpages (e.g. partner company's webpages). The Controller shall not be liable for the processing of Personal Data connected with the use of these webpages by the User. Having moved to the other webpages, the User should first consult their privacy policies and personal data protection procedures. The Controller shall not transfer personal data to any third parties outside the EEA or to any international organizations unless this proves necessary, e.g. for the recruitment process. The Personal Data shall be transferred only if the recipient complies with GDPR requirements.

[INFORMATION FOR KEMPURI SOCIAL MEDIA USERS]

▪ LinkedIn

Kempuri profile on LinkedIn.com is available at <https://www.linkedin.com/company/kempuri/>, as part of the website LinkedIn.com. You can find the terms and conditions for using personal data on the website: <https://pl.linkedin.com/legal/privacy-policy>

Kempuri as a data Controller, can see the information about statistical visits in its profile, visitors, activities, and comments. Kempuri process personal data anytime you use the button: "Like it", "observe" and "share". Personal data collected: Name and surname, Nick, ID, profile photo or other images (included private images), comments content, automatically collected technical data about visits in the social network.

Keeping profiles on social networks is for promotion and building our brand. Activities serve to connect and maintain business connections, which constitute//which is the implementation of legitimate interests (Art. 6.1.f of the GDPR).

Personal data are processed for statistics and advertising implemented through the tools provided by the applications of individual social networking sites to pursue the Controller's legitimate interests (Art. 6.1.f of the GDPR). Using communication, also from the chat box, thanks to the solutions proposed by Facebook via Messenger, you agree with the portal's policy.

[PERSONAL DATA PROFILING]

Profiling consists in any form of automated processing of Personal Data evaluating the personal aspects relating to a natural person, in particular to analyze or predict aspects concerning a data subject's work performance, economic situation, health, personal preferences or interests, reliability or behavior, location or movements, where it produces legal effects concerning the data subject or similarly significantly affects the data subject. If following the Website's development, Personal Data were to be profiled, the Controller will inform the Users thereof, and profiling will be carried out in accordance with relevant regulations. In case of profiling, the Controller shall implement appropriate measures safeguarding rights, freedoms and legitimate interests of the

Users, including ensuring an option of a human intervention at the Controller's side and a possibility to express a personal position and challenge a decision.

[RIGHTS OF USERS]

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Users have the right to data portability and the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Requests should be sent to the Controller at the contact information set out above. Users can contact the Controller also otherwise as preferred. The Website does not support "Do Not Track" requests. Please read their privacy policies to determine whether any of the third party services it uses honor the "Do Not Track" requests. Users have the right to file a complaint with the President of the Personal Data Protection Office if they consider that their Personal Data are processed in breach of mandatory rules of law.

[MODE AND PLACE OF PROCESSING PERSONAL DATA]

The Controller processes Personal Data of the Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Personal Data. Personal Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In particular, the Controller uses data encryption, physical security measures and verification in IT systems. Further, the Controller uses anti-virus software and firewalls. The User's data may be accessed exclusively by authorized individuals bound by confidentiality and subcontractors that have entered into personal data sub-processing agreements with the Controller. The Personal Data are processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Controller.

[RETENTION TIME]

Personal Data are kept for the time necessary to provide the Website services or stated by the purposes outlined in this document, and the User can always request that the Controller suspend or remove the data. Upon the lapse of a processing period, personal data shall be permanently deleted or anonymized in the absence of any bases for processing. The Users' Personal Data shall be processed in the following periods:

- in connection with correspondence – personal data shall be processed for a period necessary to provide the User with an answer or until the User raises an effective objection. The correspondence may be one-time, regular or rare, but with new messages every now and then. Therefore, it may be stored due to possible continuation of discussions. The current relevance of Personal Data is, however, checked at least once a year;
- in connection with recruitment process and future recruitment processes – the Candidate's data will be processed for the duration of the recruitment process and as regards any potential claims, for the period of 3 years. In order to use the Candidate's data in future recruitment processes and in case of other recruitment data, this data will be processed until consent is withdrawn but no longer than for a period of 5 years.
- in connection with activities prior to the conclusion of an agreement and in connection with commercial information – in connection with activities prior to the conclusion of an agreement Personal Data shall be processed until either party resigns from concluding an agreement, regardless of a reason; in connection with commercial information Personal

Data shall be processed until consent is withdrawn or an objection is effectively raised – in case the consent is not required;

- in connection with pursuit of and protection against legal claims, fraud prevention, statistics and analytics, ensuring ICT environment security, application of internal control systems – Personal Data can be processed until any potential legal claims are time-barred or for as long as is possible or required in compliance with applicable laws. In particular, if a processing period based on a given legal basis has expired, this shall not mean that Personal Data may not be processed based on another legal basis;
- in connection with financial settlements – Personal Data shall be processed for a period of five years from the end of a calendar year when a transaction has been conducted.

[CHANGES TO THE PRIVACY POLICY]

This Privacy Policy and any changes to this Privacy Policy shall apply when published on the Website. It is strongly recommended to check the Website often, referring to the last modification date listed below. If a User objects to any of the changes to the Privacy Policy, the User must cease using the Website and can request that the Controller removes the Personal Data. Unless stated otherwise, the then-current Privacy Policy applies to all Personal Data the Controller has about Users. The Cookie Policy is attached to this document and constitutes its integral part.

More details concerning the collection or processing of Personal Data may be requested from the Controller at any time. Please see the contact information at the beginning of this document.

The current version of the Privacy Policy entered into force on 29.09.2022.

COOKIE POLICY

effective as of 29.09.2022

This Cookie Policy ("**Cookie Policy**") is aimed at informing users ("**Users**") of the <http://kempuri.com> website ("**Website**") about the purposes of storing and gaining access to Cookies in the Users' terminal equipment and about options to set terms of storing or gaining access to the Cookies through browser settings or Website configuration.

The Website's Controller might store the Cookies in the Users' terminal equipment and have access thereto.

Cookies

Cookies are information saved in text files sent by the Website to the User's browser and resent by the User's browser when the User re-visits the Website ("**Cookies**"). Cookies are stored in the User's terminal equipment (computer, laptop, smartphone). They are used to maintain the User's session and to save other data so that the User does not need to enter the same information whenever they use the Website. Among other things, Cookies remember a website name, User browser data, unique settings and a period for which the data will be stored. Data saved in the Cookies are usually not matched with individual Users of the Website.

Website Controller and Owner

The Website Controller and Owner is Kempuri spółka z o. o. (limited liability company) with its registered office in Warsaw, at ul. Postępu 15, 02-676 Warsaw, Poland, entered in the National Court Register under KRS no. 0000982273, tax id. no. (NIP) 5213977856, statistical no. (REGON) 52266391400000 ("**Controller**" or "**Kempuri**"). Contact address for the Users: legal@kempuri.com; data subjects may also contact Kempuri otherwise, as preferred.

Types of Cookies

The Website uses Cookies to improve User's experience while navigating through the Website. Out of these, the Cookies categorized as necessary are stored on User's browser as they are essential for the working of basic functionalities of the website. The Controller also uses third-party Cookies that help the Controller analyze and understand how the User uses the Website. These Cookies will be stored in the User's browser only with the User's consent. The User also has the option to opt-out of these Cookies. Opting out of some of the Cookies may affect User's browsing experience.

Necessary Cookies

Always enabled. Essential for the Website to function properly. These Cookies ensure basic functionalities and security features of the Website, anonymously. Necessary Cookies:

Name	Expiration	Set by	Purpose
_clck	1 year	Microsoft Clarity	Persists the Clarity User ID and preferences, unique to that site, on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.
wp-settings-*	Persistent	WordPress	User preferences data

Functional Cookies

Functional cookies help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other third-party features.:

Name	Expiration	Set by	Purpose
SM	session	Microsoft Clarity	Used in synchronizing the MUID across Microsoft domains.

Analytics Cookies

Enabled or disabled. Disabled by default. Used to understand how visitors interact with the Website. These Cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc. Service form Google Analytics script:

Name	Expiration	Set by	Purpose
CLID	1 year	Microsoft Clarity	Identifies the first-time Clarity saw this user on any site using Clarity.

Performance

Performance cookies are used to understand and analyze the key performance indexes of the website which helps in delivering a better user experience for the visitors.:

Name	Expiration	Set by	Purpose
SRM_B	1 year	Microsoft Clarity	Used by Microsoft Advertising as a unique ID for visitors.

Marketing Cookies

Enabled or disabled. Disabled by default. Help to analyze certain actions like arriving to the Website paid campaigns and ads. Marketing Cookies:

Name	Expiration	Set by	Purpose
MUID	1 year	Microsoft Clarity	Bing sets this cookie to recognize unique web browsers visiting Microsoft sites. This cookie is used for advertising, site analytics, and other operations.
ANONCHK	1 year	Microsoft Clarity	The ANONCHK cookie, set by Bing, is used to store a user's session ID and also verify the clicks from ads on the Bing search engine. The cookie helps in reporting and personalization as well.

Others

Enabled or disabled. Disabled by default.

Name	Expiration	Set by	Purpose
_clsk	1 day	Microsoft Clarity	Connects multiple page views by a user into a single Clarity session recording.

How do I turn the Cookies off?

It is possible to stop your browser from accepting Cookies or restrict it from accepting Cookies from the Website. All modern browsers allow you to change your Cookie settings. These settings will typically be found in your browser's 'options' or 'preferences' menu. To understand these settings, you should use the 'Help' option in your browser for more details; however, any stopping or restricting of the Cookies may affect the Website's quality or even prevent the proper display of the Website on the User's terminal equipment.

Changes to the Cookie Policy

This Cookie Policy and any changes to it shall apply as of the moment they are published on the Website. It is strongly recommended to check the Website often, referring to the last modification date listed below. If a User objects to any changes to the Cookie Policy, the User must cease using the Website and/or remove the Cookies from the terminal equipment.

The current version of the Cookie Policy entered into force on 29.09.2022