

# Experty Privacy Policy

**Updated: May 23, 2018**

## **1. Introduction**

This Privacy Policy is designed to assist you (the "User") with understanding how MobileWeb Pro sp. z o.o. ("Experty ", "we", "us" or "our") collect, use, disclose and processes information that can be used to directly or indirectly identify an individual ("Personal Data") collected through use of its website. The privacy and security of our Users are of paramount importance to us.

Providing Personal Data is voluntary, but necessary to provide services electronically for your behalf or the conclusion and performance of sales contracts. The consequence of not providing Personal Data required by the Experty is the inability to provide services electronically.

Any information collected by us is treated as confidential. All information is stored securely and is accessed by authorized personnel only. Experty implements and maintains appropriate technical, security and organisational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

Your Personal Data will be processed in compliance with 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/CE (hereinafter referred to as "GDPR")

## **2. Collection of Personal Data.**

### **2.1 Who collect and process your data?**

The administrator of your personal data is Polish limited liability company under the name MobileWeb Pro sp. o.o. with registered office in Gliwice, Poland address: 44-100 Gliwice, ul. Józefa Wieczorka 11th place 9 entered in the National Court Register - Entrepreneurs' Register under the number KRS 0000570490, kept by the District Court in Gliwice, 10th Commercial Department.

### **2.2 What Information do we collect?**

When you visit our Website, you may provide us with two types of information: Personal Data that you voluntarily disclose that is collected on an individual basis; and information collected automatically when you use our Website or the services available on our Website (collectively, the "Information").

### **2.3 What Personal Data do we collect?**

Personal Data is collected only when voluntarily offered and solely for purposes that are clearly identified on our Website (the “Personal Data”). Personal information means any information that is unique to you, such as your: Name; Citizenship or Residency; Username; Password; Email address; Cryptocurrency "wallet" address; Date of Birth; Contact details; ID data; Other personal information you choose to provide.

By providing us with your Personal Data, you also consent for us to collect, hold, use and disclose your personal information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through email or through the "contact" section of our Website, we may retain, use and disclose the content of your messages together with your email address and our responses.

## **2.4 What Information is collected automatically (collectively the “Other Information”)?**

### **2.4.1. Website:**

When you use our Website or services available on our Website, we automatically collect information from your devices. We collect server log information when you use our Website, which may include (but is not limited to) the date and time of visits, the pages viewed, your IP address, time spent at our Website and the websites you visit just before and just after our Website.

### **2.4.2. Device Information:**

We collect information about the computer or mobile device you use to access our Website, including the hardware model, operating system and version, the web browser you use, and other device identifiers. Telemetry Information. If you use any of our open source software, we may collect bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device. Usage Information. If you use our Website, we will collect metadata about the files you upload for storage and we will record instances in which you have used your private key to authenticate communications.

### **2.4.3. Information Collected by Cookies and Other Tracking Technologies:**

We and our service providers use various technologies to collect information when you interact with our Website, including cookies and web beacons. Cookies are small data files that are stored on your device when you visit a website, which enable us to collect information about your device identifiers, IP address, web browsers used to access the Website, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. They are often used in combination with cookies. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the surfer.

### **3. Processing of Personal Data**

#### **3.1 Purpose for processing of Personal Data.**

Your personal data will be processed for following purposes :

- a) in order to provide services electronically - the legal basis for the processing of personal data is Article 6 (1) (b) GDPR,
- b) in order to send marketing content to you (newsletter) in a way that you have agreed - the legal basis for the processing of personal data is the legitimate interest of the Company (Article 6 (1) (f)) GDPR;
- c) for the purpose of fulfilling legal obligations incumbent on the Company based on generally applicable laws, including tax and accounting regulations - the legal basis for the processing of personal data is Article 6 (1) (c) GDPR,
- d) for analytical and statistical purposes - the legal basis for the processing of personal data is the legitimate interest of the Company (Article 6 (1) (f)) GDPR, the legitimate interest of the Company is to analyze the results of its business operations,
- e) in order to implement the legitimate interest of the Company consisting in the possible determination or pursuit of claims or defense against claims - the legal basis for the processing of personal data is the legitimate interest of the Company (Article 6 (1) (f)) GDPR.

#### **3.2 Who can receive your Personal Data?**

The recipients of your personal data may be:

- a) suppliers of IT systems and IT services,
- b) entities providing accounting services, quality of service investigations, debt recovery, legal, analytical and marketing services for the Company,
- c) operators of electronic payment systems and banks in the scope of payments,
- d) authorities entitled to receive your personal data on the basis of legal provisions.

#### **3.3 How long will we retain you Personal Data?**

Your personal data will be processed:

- a) in the case of personal data processed for the purpose of conclusion and performance of contracts concluded with the Company - for the time necessary to perform all obligations arising from the agreements indicated,
- e) in the case of personal data processed for the purpose of providing electronic services to you - for the duration of providing electronic services to you,
- f) in the case of personal data processed in order to send marketing content to you by the Company - until you object to the processing of personal data in this respect,
- g) until the expiration of the period of limitation of claims. After this period, personal data will be processed only to the extent and for the time required by law, including accounting regulations.

#### **4. Acceptance of this Conditions and Rights of the User**

4.1. We assume that all Users of our website have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from using our website.

4.2. Each of the expressed consents can be withdrawn at any time. Withdrawal of consent does not affect the legality of the processing carried out prior to its withdrawal. For evidence purposes, the Company requests withdrawal of consent in writing to the address (Poland, 44-100 Gliwice, Józefa Wieczorka 11/9) or via email (k@mobilewebpro.pl).

4.3. You have the right to access your personal data, rectify them, delete or limit processing, submit a complaint to the supervisory body regarding the protection of personal data.

4.4. You have the right to transfer data, including the right to receive data and send it to another administrator, or to request, if technically possible, transfer this data directly to another administrator.

#### **5. Protection of Personal Information**

We take reasonable steps to protect the security of the information communicated through our Website. However, no computer security system is entirely foolproof and the Internet is not a secure method of transmitting information. As a result, you indemnify and we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorised access or use of that information and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us. You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns (collectively the "Parties") liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through our Website. Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of our Website. You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you nonpromotional communications, such as technical notices, support or administrative notifications or information about your account (if you have one).

#### **6. Hyperlinks and ThirdParty Sites**

This Website may contain links to other third party websites that may collect personal information about you, including through cookies or other technologies. If you link to another website, you will leave this Website and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

## **7. Changes to our Privacy Policy**

We may change this Privacy Policy in our sole discretion at any time. Any revisions to this Privacy Policy will be posted with the Website. User agrees that it is User's obligation to visit our Website to review any changes that may be made to this Privacy Policy and other public documents with the Website. Your continued use of the Website is your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy, you shall exit the Website and are not authorized to use our Website.

If you have any further questions regarding the data Experty collects, or how we use it, then please feel free to contact us by email at: [contact@experty.io](mailto:contact@experty.io)