

Information for Potential Customers, Customers and persons representing and indicated by the above. contact entities on the processing of personal data.

Acting on the basis of art. 13 and 14 sec. 1-4 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 (General Data Protection Regulation)- hereinafter: GDPR - we provide you with the following information:

1. Joint controllers of personal data

The joint controllers of your personal data (subject to 4.2.b) are:

- 1) Semergy spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Poznań, address: ul. Towarowa 35, 61-896 Poznań, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register under KRS number 0000489705, NIP: 7831707183, REGON: 302598908, e-mail : biuro@semergy.pl – First joint controller;
- 2) Artefakt spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Wrocław, address: ul. Powstańców Śląskich 5, 53 – 332 Wrocław, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław Fabryczna in Wrocław, 6th Commercial Division of the National Court Register, under KRS number: 0000486593, NIP: 8992749307, REGON: 022291931, e-mail: firma@artefakt.pl - Second joint controller;
- 3) Semahead spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Poznań, address: ul. Towarowa 35, 61-896 Poznań, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register, under KRS number: 0000802729, NIP: 6793189537, REGON: 384327108, e -mail: biuro@semahead.pl - Third joint controller;
- 4) Grupa Tense Polska spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Poznań, address: ul. Towarowa 35, 61 – 896 Poznań, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register, under KRS number: 0000767411, NIP: 5272880176, REGON: 382400887, e-mail: kontakt@grupatense.pl - Fourth joint controller;
- 5) Wdzialni.pl spółka z ograniczoną odpowiedzialnością spółka komandytowa with its registered office in Poznań, address: ul. Towarowa 35, 61 – 896 Poznań, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Poznań - Nowe Miasto and Wilda in Poznań, 8th Commercial Division of the National Court Register under KRS number: 0000634480, NIP: 9231698844, REGON: 363841741, e-mail: biuro@wdzialni.pl - Fifth joint controller.

The joint controllers form one group of companies with capital and personal ties and jointly determine, among others, sales and organizational strategy. Together, the Joint Controllers are also referred to as the "SEO Group". If this information clause refers to "a given Joint Controller", "the relevant Joint Controller" or "Joint Controller", it refers to a company from the SEO Group (indicated above) with which you have made contact, with which you have made a contract or with which Your employer has made a contract. The joint controllers jointly determine the purposes and means of processing your personal data (subject to 4.2.b.).

You can contact each of the Joint Controllers by sending a letter to the address of the registered office or via the e-mail address indicated above, as well as via the e-mail address of the Advisor / Account Manager who you contacted.

The joint controllers made joint arrangements specifying the relevant scopes of their respective responsibilities regarding the fulfillment of obligations under the law. The content of these arrangements is available on the websites of the Joint Controllers:

- 1) Semergy sp. z o.o. sp.k with its registered office in Poznań: on the website www.semergy.pl in the GDPR tab in the footer of the website,
- 2) Artefakt sp. z o.o. sp.k. with its registered office in Wrocław: on the website www.artefakt.pl in the GDPR tab in the footer of the website,
- 3) Semahead sp. z o.o. sp.k. with its registered office in Poznań: on the website semahead.agency website in the GDPR tab in the footer of the website,
- 4) Grupa Tense Polska sp. z o.o. sp.k. with its registered office in Poznań: on the website www.grupatense.pl in the GDPR tab in the footer of the website,
- 5) Wdzialni.pl sp. z o.o. sp.k. with its registered office in Poznań: on the website www.wdzialni.pl in the GDPR tab in the footer of the website.

2. Contact point

The Joint Controllers have established a contact point that you can contact regarding the protection of your personal data:

- a) e-mail: iod@semergy.pl
- b) address details: Semergy spółka z ograniczoną odpowiedzialnością spółka komandytowa, address: ul. Towarowa 35, 61-896 Poznań (with the note "Data Protection Officer").

3. Data Protection Officer

The joint controllers have appointed a joint Data Protection Officer, Mr. Bartosz Kurzawa, whom you can contact in all matters regarding the processing of personal data. The Data Protection Officer also acts as a contact point (contact details as in point 2).

4. Purpose and legal basis for the processing of personal data:

- 1) If you are a potential customer of any of the Joint Controllers, your personal data is processed in order to:
 - a) take steps to prepare an offer and make a contract based on your interest in the offer of a given Joint Controller (legal basis: Article 6(1)(b) of the GDPR);
 - b) sending a newsletter, marketing and commercial information (legal basis: Article 6(1)(a) of the GDPR, i.e. your consent);
 - c) answering a question, - a message sent to a given Joint Controller in the contact form or in another form (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is the ability to reply to your message);
 - d) examining the assessment of the contact made by the Advisor of a given Joint Controller and recording your conversations with the Advisor (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to improve the sales process and customer service in the organization and for training purposes);
 - e) analytical and statistical (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to optimize the offer, research interest in the offer, search for new business solutions and development opportunities);
 - f) possible determination, investigation or defense against claims (legal basis: Article 6(1)(f) of the GDPR);
 - g) ensuring the organization within the SEO Group, as well as mutual communication between the Joint Controllers, including the coordination of sales activities and unifying the SEO Group's business strategy (legal basis: Article 6(1)(f) of the GDPR), which is a common purpose of the Joint Controllers.
- 2) If you are a Client of any of the Joint Controllers, your personal data is processed in order to:
 - a) conclusion and performance of the contract, including communication in connection with the performance of the contract concluded with a given Joint Controller (legal basis: Article 6(1)(b) of the GDPR);
 - b) accounting and tax settlements (legal basis: Article 6(1)(c) of the GDPR). The legal obligation to process personal data will result in particular from tax laws and the Polish Accounting Act. For this purpose, only the company with which you have made a contract is the Controller of your personal data and independently determines the purposes of processing your personal data. Further information in this scope is provided in point 7.1.
 - c) direct marketing of services provided by a given Joint Controller (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to inform the Customer about the current offer);
 - d) sending a newsletter to the indicated e-mail address (legal basis: Article 6(1)(a) of the GDPR, i.e. your consent);
 - e) ensuring compliance with the internal regulations of the Bauer Media Group, including the performance of corporate supervision and risk analysis (legal basis: Article 6(1)(c) of the GDPR in conjunction with Article 5 LkSG - German law on due diligence in the supply chain);
 - f) testing the level of satisfaction regarding the contact being implemented and customer service and recording your conversations with the Account Manager (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to improve the quality of services provided, the sales process and customer service in the organization and training purposes);

- g) analytical and statistical (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to optimize the offer, research interest in the offer, search for new business solutions and development opportunities, create sales reports and lists on the history of cooperation);
 - h) possible determination, investigation or defense against claims (legal basis: Article 6(1)(f) of the GDPR);
 - i) ensuring the organization within the SEO Group, as well as mutual communication between the Joint Controllers, including the coordination of sales activities and unifying the SEO Group's business strategy (legal basis: Article 6(1)(f) of the GDPR), which is a common purpose of the Joint Controllers.
- 3) If you are a representative, employee/associate of a Client or a potential Client of any of the Joint Controllers, your personal data is processed in order to:
- a) communication related to the presentation of the offer and the conclusion and performance of the contract made with the entity you represent, which is the legitimate interest of the Joint Controller (legal basis: Article 6(1)(f) of the GDPR);
 - b) direct marketing of services provided by a given Joint Controller (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to inform the Client's employees/associates about the current offer);
 - c) sending a newsletter to the indicated e-mail address (legal basis: Article 6(1)(a) of the GDPR, i.e. your consent);
 - d) testing the level of satisfaction regarding the contact made, the quality of service or the contract being performed, and recording your conversations with the Advisor / Guardian (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to improve the quality of services provided, the sales process and maintenance and training purposes);
 - e) analytical and statistical (legal basis: Article 6(1)(f) of the GDPR, and the Joint Controller's legitimate interest is to optimize the offer, test interest in the offer, search for new business solutions and development opportunities, create sales reports and lists on the history of cooperation with the entity you represent);
 - f) possible determination, investigation or defense against claims (legal basis: Article 6(1)(f) of the GDPR);
 - g) ensuring the organization within the SEO Group, as well as mutual communication between the Joint Controllers, including the coordination of sales activities and unifying the SEO Group's business strategy (legal basis: Article 6(1)(f) of the GDPR), which is a common purpose of the Joint Controllers.

With regard to the processing of your personal data based on a legitimate interest (Article 6(1)(f) of the GDPR), we have carried out the so-called "balance test", i.e. a test of weighing our legitimate interests, as well as your interests and fundamental rights and freedoms. The result of this test allows us to process your personal data based on a legitimate interest.

5. Source of personal data

- 1) Your personal data has been obtained by the relevant Joint Controller:
 - a) directly from you;
 - b) from publicly accessible sources (e.g. from the register of entrepreneurs or from your website);
 - c) from your employer or co-worker;
 - d) from our partners, based on your prior consent.
- 2) At the first contact of our Advisor or Account Manager and at any other time, in the event of an inquiry, you will receive detailed information about the source of your personal data.

6. Categories of processed personal data

Personal data from the ordinary categories are processed (in particular: name, surname, telephone number, e-mail address, website address, position, data regarding the contracts in progress).

7. Data recipients

- 1) The recipients of your personal data, apart from persons authorized by a given Joint Controller, will be entities processing personal data at the request of a given Joint Controller and on the basis of a concluded data processing agreement, in particular IT solution providers. If the contract for the provision of services has been made between you (or the entity you represent) and Artefakt sp. z o.o. sp.k. with its registered office in Wrocław or Semahead sp. z o.o. sp.k. with its registered office in Poznań or Grupa Tense Polska sp. z o.o. sp.k. with its registered office in Poznań or Wdzialni.pl sp. z o.o. sp.k. with its registered office in Poznań, your personal data will also be transferred to Semergy sp. z o.o. sp.k. with its registered office in Poznań, which in this respect acts as a processor in the field of accounting, administrative and internal legal services. Our Customers' data will be made available to the management company of the Bauer Media Group in order to supervise compliance with internal policies and regulations (corporate supervision), including the German law on due diligence in the supply chain (Article 5 LkSG).
- 2) Subject to point 7.1. we do not share personal data with entities outside the capital group, unless you have given your prior consent.

8. The period of personal data processing:

- 1) Personal data processed for the purpose necessary to perform the contract to which you are a party will be processed for the duration of the contract, and then for the period of expiration of claims under the contract or until the expiry of the obligation to store data resulting from the law, in particular the obligation to store documents accountants - i.e. for a maximum of 6 years from the end of the contract.
- 2) We store personal data obtained in order to conclude the contract for the period of negotiating the contract and until the end of the calendar year following the year in which you last contacted us regarding the conclusion.
- 3) Personal data processed in order to ensure compliance with the internal regulations of the Bauer Media group, including the performance of corporate supervision and risk analysis, will be processed for the period necessary to fulfill the legal obligation under German law (LkSG - German law on due diligence in the supply chain).
- 4) We process personal data processed for the purposes of direct marketing of products and services, sending newsletters and commercial information for the period of achieving this purpose or until you withdraw your consent or raise an objection, whichever occurs first.
- 5) In the case of personal data processed on the basis of the legitimate interest of the Joint Controller (other than direct marketing), personal data will be processed until the purpose for which they were collected ceases to exist, or until you effectively object to the processing of personal data.
- 6) The recording of the conversation with the Advisor or Account Manager is stored for a period of 3 months. The exception is when the recording is considered particularly useful for training purposes or necessary for evidence purposes.

9. Your rights

- 1) You have the following rights related to the processing of personal data:
 - a) the right to withdraw consent. To the extent that the basis for the processing of personal data is consent (e.g. consent to receive the newsletter and commercial information), you can withdraw this consent at any time. Withdrawal of consent will not affect the lawfulness of the processing that was carried out before its withdrawal (Article 7(3) of the GDPR);
 - b) the right to access data. You have the right to find out, among other things whether and what your personal data is processed by the Joint Controllers, for what purpose and obtain a copy of this data (Article 15 of the GDPR);
 - c) the right to rectify data. You have the right to request immediate rectification of your data if it is inaccurate. This also applies to the completion of incomplete data (Article 16 of the GDPR);
 - d) the right to erase personal data or restrict processing. In the cases specified in Art. 17 and 18 of the GDPR, you can request the Joint Controller to erase or restrict data processing. This applies in particular to a situation where you have withdrawn your consent to the processing of data or you have made an effective objection to further data processing;
 - e) the right to transmit data. If the basis for data processing is consent or a contract, you have the right to receive this data from the Joint Controller in a structured, commonly used, machine-readable IT format. You will be able to send this data to another administrator or request that the Joint Administrator send this data to another administrator (if such an operation is technically possible) - art. 20 GDPR;

- f) the right to lodge a complaint with the supervisory authority. You have the right to lodge a complaint with the President of the Personal Data Protection Office or other relevant authority if, in your opinion, the processing of personal data is in violation of the provisions of the GDPR (Article 77 of the GDPR). Address: ul. Stawki 2, 00-193 Warszawa or other communication channels - more information on the website: uodo.gov.pl.

Notwithstanding the above rights, you have the right to object. With regard to the processing of data that takes place on the basis of the legitimate interest of the Joint Controller, you can object to this processing due to your particular situation. Your data will no longer be processed, except when we demonstrate that we have legitimate grounds for processing, overriding your interests, rights and freedoms (in a particular situation). The exception is the objection to the processing of personal data for direct marketing purposes - if it is raised, the Joint Controllers will always stop processing data for this purpose. (Article 21 GDPR).

- 2) Your rights listed in point a - e above and the right to raise an objection, you may be exercised by contacting each of the Joint Controllers, Advisor / Account Manager, Data Protection Officer or through the Contact Point (contact details are indicated in points 1, 2 and 3). The exception is the exercise of rights in the field of personal data processed for the purpose indicated in point 4.2.b., where you can contact the given Administrator (with whom you have made a contract for the provision of services and this Administrator will be responsible for the implementation of your request).
- 3) In response to your request, the given Joint Controller will take appropriate actions without undue delay, not later than within 1 month of receiving the request, about which you will be informed by the First Joint Controller (except for the point above). Due to the complexity of the request or the number of requests, this period may be extended by another 2 months, of which you will be informed.

10. Other information

- 1) Your personal data will not be used for automated decision making, including profiling.
- 2) As a rule, your personal data is not transferred to a third country or an international organization (i.e. outside the European Economic Area). However, due to the use of IT services and solutions offered mostly by American companies, such as Microsoft, Google, Facebook, personal data related to the use of our websites (IP, device data, browsers, etc.) may end up in the USA. The transfer of data to a third country may take place only on the basis of one of the premises listed in art. 45-49 GDPR.
- 3) Providing your personal data is voluntary, but necessary to achieve the purposes for which the data was collected.

Thank you for reading the information and we remain at your disposal!