

Privacy Policy of Sharedkube™

version effective as of 08.11.2023

I. Scope of this Privacy Policy

Sharedkube™ (“Sharedkube”, “us”, “our” or “we”) respects your privacy and processes your personal data in accordance with the 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”).

This document (“Privacy Policy”) applies to Sharedkube’s services (“Services”), as well as to the website available at <https://sharedkube.io/> (“Website”) and our social media. The Privacy Policy describes how we collect, use, and disclose personal data of our customers, users, partners, and Website or social media visitors (collectively – “you”, or “your”).

Please note that this Privacy Policy applies to the information provided by you through our Website or social media that link to this Privacy Policy, including, for example, by registering your account or contacting us.

For purposes of this Privacy Policy, unless otherwise required by applicable law, “personal data” means any information that identifies, relates to, describes, or is reasonably capable of being associated, linked or linkable with a particular individual or household, including any information that is subject to applicable data protection laws.

II. Who is the controller of your data?

The controller of your personal data, i.e. the entity that determines the purposes and means of data processing, is Patryk Kobiela, a sole proprietor and Sharedkube™ owner, having a VAT (tax identification) number: PL 8411727618.

With regards to Sharedkube™ services provided to you, please see our Data Processing Addendum (<https://sharedkube.io/wp-content/uploads/2023/11/sharedkube-Terms-and-Conditions.pdf>).

III. How you can contact us?

We will answer any questions you have about the Privacy Policy and the processing of your personal data. Contact with us is possible via email address support@sharedkube.io or by mail address Kisewa 7c, 84-351 Nowa Wieś Lęborska, Poland.

IV. What are your rights?

In connection with our processing of your personal data, you have the right to request from us:

- a) access to your personal data, including a copy of your data;
- b) to have your data rectified in the event that your data is untrue or incomplete;
- c) to delete your data in the event that:
 - data is no longer necessary for the purposes for which it was collected by us; or
 - data is processed unlawfully; or
 - you object to the processing of data; or

- data should be deleted in order to comply with a legal obligation;
- d) limitation of data processing in case in which:
- the correctness of the data is questioned - for a period of time allowing us to verify the correctness of your data; or
 - data is processed unlawfully, but you do not want data to be deleted; or
 - your data is no longer needed by us, but may be needed by you to assert or defend claims; or
 - in case in which you raise an objection to data processing - until it is determined whether our legitimate interests override the grounds for the objection;
- e) to transfer your data to another controller in the event that data is processed by automated means in connection with a contract concluded or consent given.

In addition to the above-mentioned rights, you also have the right to object to the processing of your personal data to the extent that the processing is based on our legitimate interest and the objection is justified by your particular situation, unless we process data on the basis of legitimate interest for marketing purposes, in which case we must always consider your objection and you do not have to give us any justification.

Where we process personal data on the basis of your consent, you have the right to withdraw it at any time, with effect for the future. Withdrawal of consent does not affect the lawfulness of processing that took place on the basis of consent before its withdrawal.

If you wish to exercise your rights indicated above, or if you believe that our processing of your personal data violates applicable law, please contact us at the addresses indicated above in section III. of the Privacy Policy. As a rule, we do not charge a fee for exercising your rights. However, if the request is clearly unreasonable, repetitive or excessive, we may legally charge a reasonable fee or refuse to comply with the request.

If you believe that our processing of your personal data violates applicable law, you also have the right to file a complaint with the supervisory authority which is the Polish President of the Office for Personal Data Protection (Stawki Street 2, 00-193 Warsaw, Poland; <https://uodo.gov.pl/en/681/1404>).

V. What data we collect about you?

We receive your personal data directly or indirectly from you, especially when you use our services or visit our Website or social media, or enter into a contract with us.

When you register an account for the use of our services, you provide your name, last name, username, email address, password, address and information whether you are an individual or business client. Providing this data is necessary to register an account and buy a subscription to Sharedkube™ services. In order to complete a service order (buy a subscription), it is also necessary to provide payment card details. Please note, that your credit card details are not retained by us (if relevant), but rather transported directly to the applicable third-party service provider. We may also process your purchase records and information about your use of the services.

We may make available the possibility of logging into your account through external authentication services offered by entities independent of Sharedkube™, in particular, such as Facebook (in the case of a user with a Facebook account) or Google (in the case of a user with a Google account). In this case, we will receive your personal data related to your profile in the form of your email address, as

well as your profile name (first and last name), the photo posted in your profile, for the purpose of identifying you as a user of the services and providing access to it.

If you choose to contact us, you will also share with us some personal information from your email or traditional correspondence. If you choose to file a complaint regarding your use of the services provided by Sharedkube™ or processing your personal data, we may process your personal information contained in the complaint for the purpose of processing it, in particular your contact information (first name, last name, mailing or email address).

In the information logged on the server, it will be possible to read in real time what browser and operating system you are using and the IP address associated with your device, device ID, cookies installed on the device, date/time stamp, referring/exit pages, clicked pages, the actions you take on the Website and any other information your browser may send us. If you consent to our use of cookies or similar technologies other than those strictly necessary for the use of the Website and services, we process your personal data regarding your activity on the Website for analytical, statistical or advertising purposes, depending on which cookies you have consented to.

If you represent our customer or partner, we receive your data directly from you or via our customer or partner (i.e., your employer or the organization you are related to), for example, if you fill out a form or communicate with us through our Website or your employer indicates you in a contract as a contact person. In such cases we receive information such as business contact details – first and last name, job title, email or physical address, phone number, professional needs and interests, and your interactions with us.

In case of our social media profiles, we obtain your personal data in connection with your subscription to our fanpages or channels (clicking the "Like", "Subscribe", etc. icons), your publication of a comment under any of the posts made on the fanpage or channel, as well as in connection with sending us a message via the social network or posting an opinion about our services. We then process your personal data in particular as follows: your user ID (may include your first and last name), your identification and other information to the extent published by you on your own profile on the relevant social network, your profile photo (through which, in some cases, we can learn about your image), other photos (which may also depict an image) posted by you voluntarily under our posts, the content of your comments or opinions about our services and the content of the conversation you have with us via the social network in question, statistical data on visits to our social media profiles or channels.

VI. How do we use the information collected?

We may process your personal data we collect for the following purposes:

- a) to contact you in connection with your request about a price quote or questions regarding our services, i.e. to take steps at your request before concluding a contract (the legal basis is Article 6(1)(b) GDPR);
- b) in order to provide you our services, maintain your account, store your data, process your payment and facilitate billing communication, send you notifications related to your use of the services and your subscription, i.e. to conclude and perform a service agreement (the legal basis is Article 6(1)(b) GDPR);

- c) to provide, support, personalize, and develop our Website and services by learning about your preferences and general trends relating to the services, which constitute our legitimate interest according to Article 6(1)(f) GDPR;
- d) to help maintain the safety, security, and integrity of our services, databases and other technology assets and businesses, which constitute our legitimate interest according to Article 6(1)(f) GDPR;
- e) to respond to law enforcement requests as required by applicable law, court order, or governmental regulations, i.e. to fulfil our legal obligations (the legal basis is Article 6(1)(c) GDPR in relation to specific provisions of law);
- f) for the purpose of service billing and accounting and the performance of related legal obligations imposed on us (the legal basis is Article 6(1)(c) GDPR in relation to specific provisions of law);
- g) to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses, which constitute our legitimate interest according to Article 6(1)(f) GDPR;
- h) to process complaints which constitutes our legal obligations according to Article 6(1)(c) GDPR in relation to specific provisions of law;
- i) to establish and assert or defend against claims, which constitute our legitimate interest according to Article 6(1)(f) GDPR;
- j) for analytical and statistical purposes which constitutes our legitimate interest according to Article 6(1)(f) GDPR;
- k) to send you marketing information electronically, if you have previously agreed to it (the legal basis is Article 6(1)(a) GDPR in connection with the provisions of the Polish Law on provision of electronic services and Telecommunications law);
- l) for analytical, statistical or advertising purposes in connection with the use of cookies - the legal basis for processing is your consent (Article 6(1)(a) GDPR);
- m) to maintain social media profiles or channels, under the terms and conditions set by the operators of these social networks and to inform through it about our activities, services, events we organize, to share knowledge, as well as for the purpose of building and maintaining a community and for the purpose of communication through the available social networks' functionalities (comments, chat, messages, including event sign-ups), as well as to conduct analyses of the functioning, popularity, use of social media profiles, which constitute our legitimate interest according to Article 6(1)(f) GDPR,
- n) to inform about the quality of our services by publishing and sharing the opinions of our customers which constitute our legitimate interest according to Article 6(1)(f) GDPR.

VII. Do you have to provide your personal data?

Providing your personal data is voluntary, but without it you will not be able to register your account or buy a subscription and use the services. When you contact us or make a complaint, providing personal data is voluntary, but necessary in order to properly resolve the matter or answer the question and process the complaint. If you would like to receive an invoice from us, we may require you to provide data necessary according to the relevant law. In the case of sending you marketing information, providing your email address is voluntary, but necessary for you to receive such communication from us.

VIII. How long do we store your data?

We keep your personal data for as long as necessary for the purposes for which we originally collected it or to comply with other legal requirements.

The data is kept for the time we provide services to you. If you request us to delete your user account and discontinue the provision of services, under the rules set forth in the Terms and Conditions, your user account will be promptly deleted. If you are inactive for at least 2 years, we will also delete your account

We store payment data in accordance with the periods indicated in tax and accounting laws. Currently, according to Polish law, this period is 5 years, counting from the end of the year in which the transaction was made.

Selected personal data may be processed by us after the aforementioned time for the purpose of establishing, asserting or defending against possible claims, for the period resulting from the statute of limitations for such claims.

Personal data that we process on the basis of your consent will be stored at most until you withdraw your consent to the processing of personal data.

IX. Can we disclose your personal data?

Sometimes, in order to provide services to you, we need external entities to support us and perform services for us. Accordingly, the recipients of your personal data may be (not limited to) entities providing us support and assisting us with sales, marketing and communication initiatives, IT or hosting services, payment processors, consulting and accounting service providers, identity authentication and information technology service providers and other entities to the extent necessary for the purposes of data processing. Business partners and service providers are required by contract to keep the information received on behalf of us confidential and secure and not use it for any purpose other than the purpose for which it was provided to them.

Please be advised that we send data especially to the following third-party service providers:

- MongoDB, Inc.,
- Amazon Web Services, Inc.,
- Stripe, Inc.,
- Google LLC.

In connection with our use of the above mentioned third-party service providers your data may be transferred to entities outside the European Economic Area, primarily to the United States, but only if the requirements of Chapter V of the GDPR are met (e.g., based on a European Commission decision on the adequacy of safeguards in a particular country, or based on standard contractual clauses).

We may also share your data in cases required by law, and in order to establish, exercise or defend our rights.

We may disclose or transfer personal data as part of any actual or contemplated merger, sale, transfer of assets, acquisition, financing or restructuring of all or part of our business, bankruptcy or similar event, including related to due diligence conducted prior to such event where permitted by law.

In connection with our use of cookies, your personal data may be transferred to the providers of these cookies, which may involve the transfer of your personal data to companies in the US or other countries outside the European Economic Area. It requires these entities to provide adequate safeguards for data transfers set out in Chapter V of the GDPR. Similarly, the operator of social networks we use may transfer your personal data outside the EEA. Remember that in addition to us, the controller of your personal data is the operator of a particular social network you use and through which you visit our profile. In addition, read the rules and privacy policy of the social network you use and through which you visit our profile.

You can obtain a copy of the legal measures used for data transfers outside of the EEA by contacting us (contact details are set out in section III. Of Privacy Policy).

X. Our use of cookies and similar technologies

Depending on your choices made while visiting the Website, we may use cookies for statistical, analytical or advertising purposes in addition to technically necessary cookies.

Cookies are small packets of data that are stored locally in the cache or hard drive of your device from which you access the Website. In addition to cookies, other technologies that collect information about your behavior on the Website may be also used. Hereinafter, all of these technologies are collectively referred to as "cookies" for ease of reference.

In accordance with applicable law, we may store cookies on your device if it is necessary for the proper operation of the Website and services (these cookies are described below as necessary). For the use of any other types of cookies (especially analytics or advertising cookies), we need your prior consent.

Strictly necessary cookies do NOT legally require your prior consent. They are automatically installed on your device when you visit the Website or make certain choices/activities on the Website.

If you consent to this when you first visit the Website or later through the cookies settings panel, we will also use statistical, analytical or advertising cookies.

You can change your cookies settings at any time using the settings panel available on the Website under the "Cookies Settings" button.

Detailed information about the cookies used by us on the Website and their functions can be found in the above-mentioned cookies settings panel.

XI. Changes to Privacy Policy

The Privacy Policy is reviewed on an ongoing basis and may be updated if there is a change in the law affecting the processing of your personal data, as well as if we make changes to the processing of your personal data. When we make changes, we will make the new version of the Privacy Policy available on the Website. The date of the most recent update is listed at the top of this document under the "effective" date.