

## PRIVACY POLICY

### What is our purpose?

Protection of personal data is an important aspect at "Livespace" sp. z o. o. (Ltd), and something we always take into consideration when providing our services. The intent of "Livespace" sp. z o.o. is to process personal data transparently and diligently. Terms for processing personal data by "Livespace" sp. z o.o. and the rights of the subjects of this data are defined herein.

Therefore, we have implemented regulations included in the General Data Protection Regulation of the European Parliament and Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons with regard to processing of personal data and on the free movement of such data, and repealing Directive 95 / 46 / EC (General Data Protection Regulation, hereinafter referred to as "GDPR") to the full scope of our activity and we process your personal data on the basis of GDPR principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality and accountability.

We hope that you find answers to all your questions regarding the security of your personal data within this Privacy Policy. In case of any further doubts, you can always contact us by sending a message to the following address: [dataprotection@livespace.io](mailto:dataprotection@livespace.io).

### Security of your data

Security of your data is our topmost priority. We employ technical and organisational measures intended to protect your personal data, including the fact that access to our application is only possible via encrypted SSL connections, authenticated by a proper certificate.

### Who is the Controller of your Personal Data?

The Controller of your Personal Data is "Livespace" sp. z o.o. (Ltd) with its registered seat in Warsaw (02-516), in 17/12 Tadeusza Rejtana St., registered within the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 8th Commercial Division of the National Court Register, under KRS#: 0000358766, with a VAT#: 5213568709; REGON#: 142447001, with share capital of 6250.00 PLN, hereinafter referred to as "Livespace" or "Data Controller".

### What are the purposes, categories and legal grounds for processing your Personal Data?

Livespace processes your personal data in the scope which depends on the purpose of processing the data, which in turn determines the legal ground which legitimises the processing itself.

#### Setting up an account to gain access to our service (the application)

##### Purpose of processing data

In order to enable you to access our service (use our application), we have to identify you as an individual user and obtain your contact details, which we will be able to use to get in touch with you.

##### Categories of processed data

The Data which we gather for this purpose include the details which allow us to identify you (first and last name, the name of your company), and your contact details (e-mail address, telephone number).

##### Legal basis

Art. 6 section 1 letter b) of GDPR - processing is necessary for the performance of a contract.

Providing some of your details is necessary for you to be able to use our services. If you do not provide the personal data which is indicated as obligatory within our system, we will not be able to

enable you to use our services/some of the functionalities. Providing any data marked as not mandatory is voluntary and is not required for you to be able to use our services.

### **Providing particular functionalities and security of our services**

#### **Purpose of processing data**

We want to continually improve the services which we provide and enhance their functionalities and security. This will allow us to continue developing our application our application with new modifications and features. We would also like to inform you about any changes which are being implemented, so that you can use our application to its fullest potential.

#### **Categories of data**

Your personally identifiable information, contact details and data related to using the application and our website (data regarding your activity within the application and on the website, history of your visits, browsing, sessions, IP address, data regarding the web browser and operating systems which you are using).

#### **Legal ground**

Art. 6 section 1 letter f) of GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller in the scope of improving the services which we provide.

### **Contacting you - responding to your questions, complaints and requests**

#### **Purpose of processing data**

We want to communicate with you, and we care about your satisfaction concerning the services which we provide. Therefore, we would like to have the ability to contact you and react to any of your questions, complaints and requests related to our services.

#### **Categories of data**

Your personally identifiable information and contact details, data regarding the way you use our services, data which is the subject of your questions, complaints and requests.

#### **Legal ground**

Art. 6 section 1 letter f) of GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller in the scope of remaining in contact with you and providing help/responding to any of your questions.

### **Determination, pursuing or protection of our rights**

#### **Purpose of processing data**

Based on the services which we provide, a need may arise to clarify the factual or legal status in order to establish, exercise and possibly defend claims resulting from using our services.

#### **Categories of data**

Your personally identifiable information and contact details, other data required to establish, exercise and possibly defend those claims.

#### **Legal ground**

Art. 6 section 1 letter f) of GDPR - processing is necessary for the purpose of the legitimate interests pursued by the controller in the scope of establishing, exercising and defending claims before courts of law or with the help of other appropriate national authorities.

### **Marketing of our services**

#### **Purpose of processing data**

We are a business venture providing a service to the business community - marketing of our services is an essential element of our business activity. Therefore, we use the data of our clients, users of our application and the persons subscribed to the newsletter mailing list/persons who receive our

ebooks and other informational and advertising materials, for marketing purposes, mainly by informing them of any courses or events which we are currently organising.

#### **Categories of data**

Your personally identifiable information and contact details, data regarding your activity within our service.

#### **Legal ground**

Art. 6 section 1 letter f) of GDPR - processing is necessary for the purpose of the legitimate interests pursued by the controller in the scope of marketing their services.

Art. 6 section 1 letter a) of GDPR – consent for processing your personal data.

#### **Profiling**

Based on your personal data which we possess we evaluate whether you might be interested in a particular marketing or informational material and using this as the ground for our further action, we send it to you, or we don't. We want to respond to your needs and meet your preferences as much as possible.

### **Recruitment**

#### **Purpose of processing data**

If you are a candidate for employment, we process your personal data for the purpose of conducting the recruitment process. It may so happen that we would like to keep your details on file for future recruitment processes. In such case we will request you consent for further processing of your personal data.

#### **Categories of data**

Your personally identifiable information, such as: your first and last name, date of birth, names of your parents, place of residence (address for correspondence), education, previous work history. If you provide any additional information in your CV you also consent for this information to be processed by us with the purpose of conducting the process of recruitment.

#### **Legal ground**

Art. 6 section 1 letter b) of GDPR – by applying for the particular recruitment process you initiate activities on our side which are necessary in case the process results in signing an employment contract.

Art. 6 section 1 letter f) of GDPR – our legitimate interest in the cope of conducting a particular recruitment process.

Art 6 section 1 letter a) of GDPR – consent for the processing of your personal data in case you provide additional personal data with the purpose of taking part in future recruitment processes.

### **Employment/other forms of cooperation**

#### **Purpose of processing data**

If you are one of our employees or partners, we process your personal data with the purpose of conducting our cooperation and carrying out the provisions and obligations of the employer or the ordering party, particularly with the purpose of settlement, archiving, accounting and protection against possible future claims.

#### **Categories of data**

Your contact details, your personally identifiable information, any data necessary for settlement and keeping required records.

**Legal ground**

Art. 6 section 1 letter c) of GDPR – if you are one of our employees or a contractor, in some cases the processing of your personal data is necessary for the purpose of carrying out the legal obligations imposed onto us as your employer or ordering party.

Art. 6 section 1 letter b) of GDPR – if you have entered into an agreement with us as our partner, processing of your personal data may be required for us to carry out the provisions of this agreement.

Art. 6 section 1 letter f) of GDPR – in some justified cases the processing of your personal data may be necessary due to our legitimate interest, e.g. in case of a need to defend against any claims resulting from our agreement.

**Business cooperation****Purpose of processing data**

By mutual cooperation on carrying out particular projects, providing services to each other or delivering products or solutions, we process your data as the data of our business partners. It is required to properly carry out the provisions of our contracts, conduct business, and the mutual development of our business activity.

**Categories of data**

The personal data of you and your employees/partners: contact details, personally identifiable information, data necessary for settlement purposes, for provision of services or delivery of products / solutions.

**Legal ground**

Art. 6 section 1 letter b) of GDPR – if you have entered into an agreement with us as our partner, processing of your personal data may be required for us to carry out the provisions of this agreement.

Art. 6 section 1 letter f) of GDPR – in some justified cases the processing of your personal data may be necessary due to our legitimate interest, e.g. in case of a need to defend against any claims resulting from our cooperation.

**The period for which your data is stored**

Once you set up an account on our website, your personal data will be stored by us for the duration of the validity of this account and the following 6 months, to provide the service of enabling the access and use of the application as well as for marketing purposes. After this period your data will only be stored with the intention of considering any complaints and claims related to the services which we provide, for the duration of a period which is defined by the provisions of the law, with regards to the statute of limitations for those types of claims.

If you are a candidate for employment we will process your personal data throughout the duration of the recruitment process, and further in case you are employed / begin cooperation with us, for as long as legally required for employee / contractor data. If you are not hired or if you agreed for us to process your data in future recruitment processes, we will store your data in our database for the period of three years from the date we receive your CV.

If you are our partner / contractor your personal data will be stored for the duration of our cooperation, and further, for the duration required by the provisions of the law.

If you are our business partner we will process your personal data throughout the duration of our cooperation, and further, for the duration required by the provisions of the law.

If we are processing your personal data for marketing purposes we will store your data for as long as you object to this purpose of processing or until you withdraw consent for this scope of processing, depending on the legal ground which we use to process your data.

Following the above mentioned terms your personal data will be removed from our records.

## Source of your personal data

As a rule, we receive your personal data from you - when you complete the registration form or perform any activities related to creating and transferring your data to us. However, it may so happen, that your account within our application will be set up by another person, for example, your employer or coworker. In such case, your initial registration data will be disclosed to us by that person who sets up your account.

## Recipients of personal data

Your personal data will be transferred by Livespace, in case it is required for the particular purpose of processing and in compliance with the proper legal grounds. Current categories of recipients of your personal data include:

- Data center operators;
- Cloud services providers;
- Providers of access to innovative technologies and internet advertising;
- Providers of advertising services;
- Providers of legal and accounting services;

Livespace may also disclose your personal data upon request of the authorised state authority, within the scope and upon a legal ground defined within the provisions of the law.

## Where do we transfer your personal data?

Your personal data may be transferred to recipients located within the European Economic Area (hereinafter referred to as "EEA"), and beyond (to Third Countries).

Any transfer of your personal data to Third Countries may only take place under the conditions defined within chapter 5 of GDPR, to countries for which the European Commission decided that the third country ensure an adequate level of protection, as per Art. 45 of GDPR.

You may obtain a copy of your personal data which is transferred to Third Countries and information regarding the location to which it has been transferred, by contacting us using the following e-mail address: [dataprotection@livespace.io](mailto:dataprotection@livespace.io).

## Additional limits on use of your Google user data

### The purpose of processing

We want to provide you with the opportunity to integrate our services with services provided by Google. The integration consists of synchronising your Google calendar with your Livespace calendar, as well as synchronising your email. This means that the app needs to read and modify the events in your calendar, read your messages in your Gmail account, and send messages and save messages sent from Livespace. Thanks to this, it will be possible to synchronise data quickly and efficiently. The data will not be used to display advertisements or for any other purposes not related to the provision of the service.

### Data categories

Basic data for your Google account (name, email address), content, headers, and attachments of email messages read from your Gmail account and data of new email messages created and sent using your Gmail account.

### Legal basis

Article 6 paragraph 1 GDPR - indispensability to perform the contract. Providing some of your data is necessary to fully use our services to integrate them with Google services.

## **Your rights as the subject of the personal data related to the processing of that data**

Livespace processes your personal data in compliance with the provisions of the law while respecting your rights related to the processing of that data. In order to pursue any of the below-mentioned rights, you may contact us:

- by sending an e-mail to the address: [dataprotection@livespace.io](mailto:dataprotection@livespace.io)
- by sending a letter to our address for correspondence:  
Livespace sp. z o. O., 17/12 Tadeusza Rejtana St., 02-516 Warsaw, POLAND.

You may contact us by means of the above also with the purpose of submitting complaints, questions, requests or any doubts related to the processing of your personal data.

When you contact us with regards to any of your rights as the subject of the personal data, we will inform you of any activities which have been undertaken within no more than 1 month from the day of receiving your request. In case a particularly complicated character of your demand makes it impossible to provide the required information within this period, we will notify you and give a cause for any delay. In such case, we will use our best efforts to respond to your request as soon as possible.

### **The right of access to data**

Based on this principle you may obtain from us the information on whether we are processing your personal data. If so, you have the right to receive:

- access to your personal data;
- information regarding purposes of processing of your personal data, categories of the processed data, recipients or categories of recipients of the data, the planned duration of storing the personal data or the criteria used to determine this period, the right to demand from the Data Controller to correct, remove or limit processing of your personal data, and to submit an objection against such processing and the right to lodge a complaint to a supervisory body, regarding sources of the data, automated decision making, including profiling and if the data is transferred outside of the European Union, information regarding any safety measures used in the process of transferring the data - this information is regulated by this Privacy Policy;
- copies of the personal data which is being processed.

### **Right to have the personal data rectified**

You have the right to have your data rectified or completed if it is incorrect or incomplete.

### **Right to erasure (“right to be forgotten”)**

You have the right for your personal data to be removed in the following cases:

- your personal data is no longer necessary in relation to the purposes for which they were collected or to be processed otherwise;
- you withdraw consent on which the processing is based, and where there is no other legal ground for the processing;
- you object to the processing of your personal data;
- your personal data has been processed unlawfully;
- your personal data has to be erased for compliance with a legal obligation, which Livespace must fulfil.

In some cases, regardless of your request for your data to be erased, we may be obliged to keep storing it in the scope necessary to fulfil the purpose of a legal obligation or establish exercise or defend related claims.

### **Right to a restriction of processing**

You have the right to demand from the controller, that the processing of your personal data is restricted in one of the following cases:

- you contest the accuracy of the personal data - Livespace shall restrict the processing of your personal data for the period enabling verification of the accuracy of the personal data;
- when the processing of your personal data is unlawful, and you request the restriction of its use;
- when your personal data is no longer needed for the purposes of processing by Livespace, but you require it for establishing, exercising or defending legal claims;
- when you object to the processing of your personal data, in such case processing of your personal data is restricted pending the verification of whether the legitimate grounds of Livespace override the grounds of your objection.

### **Right to data portability**

You have the right to receive your personal data, which you have provided to us, in order to transmit this data to another controller of personal data. You may also demand for your data to be sent directly to the other controller by Livespace, as long as it is technically feasible.

Carrying out of the right to data portability may be subject to limitation in case it adversely affects the rights and freedoms of others.

### **Right to object**

You have the right to object at any time to the processing of your personal data, including profiling based on legitimate legal grounds. In case your objection is valid, and there are no other compelling legitimate grounds for the processing of your personal data, it will no longer be processed by Livespace.

In case you object to the processing of your data for direct marketing purposes, Livespace shall no longer process your personal data for this purpose.

### **Right to withdraw consent**

Giving any form of consent for the processing of personal data by Livespace is voluntary, and you have the right to withdraw such consent at any time. Withdrawal of such consent does not influence the legality of the processing which Livespace carried out before the consent was withdrawn.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint to the Inspector General for the Protection of Personal Data or its legitimate successor if you think that the processing of your personal data violates your rights.

### **Changes to this Privacy Policy**

If such need arises, we will update both the functionalities of the service we provide and our internal regulations, which are to ensure their security. Any changes or updates to our Privacy Policy shall be announced and made available through our website. If you provided us with your e-mail address, we will inform you of any critical changes to our Privacy Policy in a separate email.

### **Internal regulations implemented by Livespace**

Aside from this Privacy Policy, the principles of Livespace's operations have been described in the Terms of Service ([https://www.livespace.io/files/en/Livespace\\_terms\\_of\\_service.pdf](https://www.livespace.io/files/en/Livespace_terms_of_service.pdf)) and our Cookie Policy ([https://www.livespace.io/files/en/Livespace\\_cookie\\_policy.pdf](https://www.livespace.io/files/en/Livespace_cookie_policy.pdf)).