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PRIVACY POLICY

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1. Definitions

It is our intent to ensure that the wording of the Policy is comprehensible, precise and facilitating the proper interpretation of its contents, which is why we are presenting a glossary of terms used herein:

- **Controller** – the entity that defines purposes and ways of processing your Personal Data; i.e. GO.PL sp. z o.o. with its registered office in Warsaw, ul. Żwirki i Wigury 16, 02-092 Warsaw, registered by the District Court of Warsaw, 12th Commercial Division of the National Court Register, under KRS number: 0000568391, NIP number: 7010497945, also referred to as **GO.PL**;
- **Personal Data** – any information relating to an identified or identifiable natural person by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including IP addresses of devices, e-mail addresses, location data, online identifiers and information collected by cookie files or other similar technologies;
- **Cookies** – pieces of data, in particular text files, which are stored on an end device of the user of the Services;
- **Clients** – entities which, directly or indirectly, outsource activities, in particular marketing activities, to us in the Services environment;
- **Profiling** – the process of automated processing of your data that involves using your data to assess certain factors specific to you, in particular to analyze or

predict your interests or other behavior, such as your credibility, approximate location, movement, consumer preferences;

- **User** – any natural person using one or more Services;
- **Services** – services provided by GO.PL or WP;
- **WP** – the corporate group having capital links with Wirtualna Polska Holding S.A.;
- **Joint Controller** – the entity cooperating with the Controller with which the Controller jointly defines purposes and ways of processing Personal Data;
- **Trusted Partners** – entities with which the Controller cooperates, including advertisers, e-commerce entities, media houses and advertising networks, brokers and other intermediaries operating on the Internet advertising market, interactive agencies specializing in Internet marketing, advertising networks operating on the online advertising market in the programmatic technology, entities providing analytical services. A list of Trusted Partners along with their processing objectives for your data is available here;
- **IAB Trusted Partners** – Trusted Partners recommended by the Interactive Advertising Bureau. A list of IAB Trusted Partners is available here;

We attach particular importance to protecting privacy of Users using the Services. This Policy describes the rules governing the processing of Personal Data of Users in connection with using the Services.

2. Information about the Controller

The Controller of your Personal Data in connection with your use of the Services is GO.PL.

You can contact the Controller:

- in writing, to: GO.PL sp. z o.o., ul. Żwirki i Wigury 16, 02-092 Warsaw
- by e-mail to the following address: publishers@wpartner.pl

GO.PL is part of WP. WP, any affiliates and subsidiaries of WP, as well as Trusted Partners that exist in the Services environment are also the Controllers of your Personal Data. For detailed information about WP's processing of your personal data, please see our Privacy Policy.

You can contact Wirtualna Polska:

- in writing, to: Wirtualna Polska Media sp. z o.o. / Data Protection Officer / ul. Żwirki i Wigury 16, 02-092 Warsaw

- by e-mail to the following address: iodo@grupawp.pl
- via a contact form onas.wp.pl/formularz_rodo

3. Particulars of the Data Protection Officer

We have appointed a Data Protection Officer, who may be contacted in all matters pertaining to the processing of Personal Data and exercising the rights related to the processing:

Mailing address:	GO.PL / Oskar Cisiński / IOD / Żwirki i Wigury 16, 02-092 Warsaw
E-mail:	iodo@grupawp.pl

4. What data do we process?

We process Personal Data that you provide, leave or to which we may get access during your use of the Services and the services of our Trusted Partners, in particular:

- made available by you in the browsing history of websites and apps and those that you leave when using the WP Services (e.g. data you have made available through forms, data about visited websites, apps and content of interest to you, including advertising, your searches, your clicks, the way you use the Services), as well as data from websites of Trusted Partners, including Clients, in particular histories of your purchases, especially those made after clicking on advertisements delivered to you in the environment of the Services,
- information stored on the end-user devices that you use, including information on your browser and data about your geographic location,
- recorded, among others, in cookies installed in our websites and apps and in websites of our Trusted Partners and outside of the Services.

Please remember that provision of Personal Data by you is voluntary; however, a failure to do so (including refusal to provide access to information and have the data stored on your device, including with the use of cookies) with regard to data marked as necessary to provide services for you will prevent their provision, in particular it will make it impossible for you to register and use the Services, and it

will make it impossible for us to provide you with information, content and offers you are looking for, to process and respond to your complaint and to respond to your inquiry or some other request. The scope of Personal Data processed in the various Services may vary. You may always find information on this subject in the panel linked to the respective Service, or you may always ask our Data Protection Officer.

5. For what purpose, on what basis and how long do we process your Personal Data?

Purposes of data processing:	**Legal basis:**	**Processing period:**
performance of the agreement entered into between GO.PL and the User (e.g., the terms and conditions that the User accepts before using a Service), including the provision of Services to Users and the customization of the Services to the needs of Users, maintenance and technical support of the Services necessary for the provision of the Services ("provision of the Services")	Article 6(1)(b) of the GDPR – as needed to perform the agreement to which the User is a party	until the expiration of the agreement
ensuring security, preventing fraud and fixing errors necessary to provide the Services ("ensuring security")	Article 6(1)(f) of the GDPR * – legitimate interest of the Controller, involving ensuring security of the Services provided	until submission of an effective objection

development and improvement of the Services ("optimization"), delivery and presentation of advertising and content, maintenance and technical support of the Services, measurement of content performance, the Services or advertising ("technical provision of the Services"), statistical measurement, getting to know audience due to statistics or combination of data from various sources ("statistics"); marketing (including analysis and profiling of data for marketing purposes) of the Controller's products and services ("self-marketing");	Article 6(1)(f) of the GDPR * – legitimate interest of the Controller, consisting in the possibility of optimization, technical execution of the service, statistics and self-marketing	until submission of an effective objection
marketing (including analysis and profiling of data for marketing purposes) concerning the products and services of third parties ("third party marketing"). Third party marketing includes profiling** such as: creating a profile for personalized advertising, using limited data to select advertising, creating a profile for personalized advertising, using profiles to	Article 6(1)(a) – voluntary consent	until the consent is withdrawn

select personalized advertising, adjusting the Services to Users' needs, creating profiles with a view to customize content, using profiles to select personalized content and measurement of content performance, and measurement of advertising performance,		
preparation and delivery of responses to requests or other reports submitted to GO.PL	depending on the purpose for which the request or other report was submitted, this includes taking action leading to the execution of an agreement (Article 6(1)(b) of GDPR), a legal obligation (Article 6(1)(c) of GDPR in conjunction with Articles 15-22 GDPR), or a legitimate interest of the controller (Article 6(1)(f) of GDPR), which includes the ability to respond to a request or report	until the response to a request or another report to GO.PL is prepared and given; and in the case of reports concerning the exercise of rights of data subjects – 5 years after they are exercised or a response to the report is given
determination and pursuit of claims or defense against them	legitimate interests of the controller (Article 6(1)(f) of the GDPR*) involving the ability to determine, pursue or defend against claims	until the claims expire, but no longer than 6 years after the end of the calendar year, in which the event

		that could become the basis for the claims arose
fulfillment of statutory duties arising under tax regulations and accounting regulations involving, among others, the necessity to issue and archive a bill	legal obligation (Article 6(1)(c) of the GDPR in conjunction with Article 74 of the Accounting Act and other tax legislation)	5 years after the end of the calendar year, starting from the next year when the event giving rise to the legal obligation occurred
storing and/or accessing information on a device	Article 6(1)(a) of the GDPR (a person's voluntary consent)	until the consent is withdrawn
handling of requests and proceedings conducted by authorized bodies, e.g. courts, prosecution offices, law enforcement authorities, offices that may be related to User data	legal obligation (Article 6(1)(c) of GDPR in conjunction with the regulations authorizing the relevant body to submit a request)	until the request is satisfied

* In relation to the processing of your Personal Data based on GO.PL's legitimate interest, we perform a test of balance between our legitimate interest and your rights. In the event of the fundamental purposes, functions and special features, such as, e.g. ensuring security, optimization, technical provision of the Services, statistics, your objection may turn out to be ineffective.

** The advertisements and editorials displayed will be profiled using the following of your data and in accordance with the following criteria:

- Your activity within the GO.PL Services and services of our Trusted Partners;
- Your activities and interactions with advertising;
- Your approximate location, the size of the town/city you reside in;

- Information stored on your end-user devices, such as the type of end-user device, browser type, operating system you are using, and the language set in the operating system you are using.

Information on your profile may be used to profile advertising and content in our Services and services of our Trusted Partners and outside of the Services, especially in advertising networks which aggregate and intermediate in the sales of advertising. Advertising networks collect data on users from all websites cooperating with these networks and then use such data to display advertising that is best suited to your interests.

Functions and special features.

To achieve the above purposes, we use the following functions and special features:

Position	Objective
Matching and combining data from other data sources	performance of the Services, optimization, technical provision of the Services, statistics, ensuring security, self-marketing, third party marketing
Linking different devices	Optimization, statistics, ensuring security, self-marketing, performance of the Services, technical provision of the Services
Identifying devices based on information transmitted automatically	Optimization, statistics, ensuring security, self-marketing, third party marketing, technical provision of the Services, provision of the Services

Actively scanning device characteristics for identification	Ensuring security
Use precise geolocation data	Optimization, statistics, ensuring security, self-marketing, third party marketing, technical provision of the Services, provision of the Services

6. Data recipients

Recipients of your Personal Data in connection with your use of the Services will be also Trusted Partners, including Clients. Trusted Partners process your Personal Data, in particular based on your voluntary consent. Please note that in specific cases, they may process your Personal Data without your prior consent. If your Personal Data are processed on the basis of legitimate interest of our IAB Trusted Partners, you may object to the processing in advanced settings. Detailed purposes of processing of your Personal Data by the other Trusted Partners and the manner of informing them of your intention to exercise your rights may be found in the privacy policies of those Trusted Partners.

For objective reasons, we are not able to state the names of all Trusted Partners here, in particular due to the lack of direct relations with some of them, for example when a Client orders advertising to be placed on our space through the intermediation of a Trusted Partner that is an advertising network.

Your Personal Data may be transferred to data processors that process Personal Data under engagement from the Controller, which may include among others: IT service providers, payment service providers, marketing agencies, etc., based on an agreement entered into with the Controller and solely in accordance with the Controller's instructions. Your Personal Data may also be disclosed to entities authorized to receive it under applicable law.

Your Personal Data may be transferred to recipients in third countries, i.e. countries outside the European Economic Area, especially when:

- it is necessary to provide Services for you,

- it is necessary for the execution and performance of a contract between you and GO.PL,
- you give your prior consent - for example, consent to the processing of Personal Data for marketing purposes by our Trusted Partners from third countries.

Before transferring your Personal Data to entities located in third countries, we verify the guarantee of the high level of protection for such data and use standard contractual clauses. However, in certain situations, the transfer of your Personal Data to third countries may entail risks due to the lack of a decision declaring an adequate level of protection outside the EEA and the lack of safeguards and effective legal protection measures in third countries.

7. What rights do you have?

You have the following rights in connection with our processing of your Personal Data:

- right of access to your data
- right to request rectification of the data
- right to erasure of the data
- right to lodge a complaint with a supervisory authority – the President of the Personal Data Protection Authority
- right to restriction of processing of the data
- right to withdraw your consent – if your Personal Data are processed on the basis of consent. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal. WP provides you with the opportunity to grant consent and withdraw it using the platform registered and verified by IAB (our registration number in the Transparency & Consent Framework standard is 72),
- right to transfer your Personal Data – if your Personal Data are processed on the basis of consent or as part of a provided Service
- right to object – if your Personal Data are processed on the basis of the controller's legitimate interest. Once you have effectively made an objection, your Personal Data will not be processed unless there is a valid legitimate basis for processing. Your Personal Data will not be processed for self-marketing after you have filed an objection.

To exercise the above rights, please contact the Controller or the Data Protection Officer (contact details above).

8. Additional information

Cookies and other similar technologies

GO.PL and Trusted Partners upload information in the form of cookies or in a different form to end devices (e.g. computer, laptop, smartphone, Smart TV) and obtain access to information collected with the use of cookies and other technologies which identify end devices.

A publisher's website may place a cookie on your browser if your browser allows it. Importantly, a browser only allows a website to access cookies placed by that website, not those placed by other websites.

Cookies contain the domain name of the website from which they originate, the time they are stored on the end device and a unique name. Information stored in cookies is often necessary for the proper operation of a website. Cookies may store a unique number that identifies a device, but the user's identity is not determined on the basis of the number.

We use cookies and other similar technologies for the following purposes:

- to provide the Services;
- to adjust the content of the Services to the User's preferences and optimize the use of websites;
- to compile statistics that help us understand how Users use the Services, which enables us to improve their structure and content;
- to perform research and measurements of the audience of our Services, editorial content including advertisements in order to analyze, evaluate, introduce, improve and develop our Services;
- to maintain the User's session so that the User does not have to re-enter their login and password on each sub-page of the respective website and app;
- to present advertisements and carry out surveys, among others, in a manner that takes into account the User's interests or place of residence (customization of the advertising message) and with a guarantee of exclusion of the possibility of repeated presentation of the same advertisement to the User, as well as remarketing which involves displaying advertisements of Clients whose sites you have visited or whose goods or services you have been interested in, e.g. you clicked on the Client's advertisement earlier;

- to link multiple devices belonging to the same User to achieve one or more of the purposes described above.

What types of cookies do we use?

In view of the lifespan of cookies and other similar technologies, we use two main types of these files:

- session cookies - temporary files stored on the User's end device until the user logs out, leaves the website and apps or shuts down the software (web browser);
- persistent cookies - stored in the User's end device for the time specified in the cookie parameters or until they are deleted by the User.

In view of the purpose of cookies and other similar technologies, we use the following types of cookies:

- necessary for the operation of Services – making it possible to use our Services, e.g. authentication cookies used for Services which require authentication;
- files that ensure security, e.g. those used to detect abuses concerning authentication;
- performance cookies - making it possible to collect information about how websites and apps are used;
- functional cookies - allowing for "remembering" the User's selected settings and personalizing the User interface, e.g. with regard to the User's chosen language or region of origin, font size, appearance of the website and apps, etc.;
- marketing cookies - making it possible to deliver advertising content to Users more tailored to their interests;
- statistical cookies - used to count statistics about websites and apps.

Local Storage (LS)

To ensure the convenience of using our services, we use the LS technology, whose operation is similar in principle to cookies, but with slightly different properties. LS is a separate part of the browser's memory used to store data saved by services. The data in LS is stored long-term by the browser and is not deleted when the browser is closed and neither does it have a specific expiration time. We emphasize that we do not use this technology to "track" or identify Users, but only for convenience and to provide the best possible Service level. We use the LS technology, for example, to remember settings, retain radio configurations, or store data on recommended entries.

Web Push

We use the Web Push technology to provide you with short current notifications, especially the latest news, information about our Services and offers from our Trusted Partners.

ID Exchange

GO.PL provides the service of accessing the ID Exchange Solution in real time by integrating the ID Exchange Solution with the Customer Service to generate and manage CEEIDs.

For more information on the ID Exchange Solution, click here.

The Client and GO.PL are joint controllers of Personal Data for the purpose of collecting, hashing, transmitting, saving, matching and collating, modifying or adopting data to generate unique CEEID user identifiers.

The joint arrangements of the joint controllers can be found here.

You can find the List of ID Exchange's Partners here.

Users may withdraw the consent to the processing of personal data via the Privacy Center which can be found here.

Managing browser settings

To receive notifications from us, you may give consent, which you may withdraw at any time using your browser settings.

Notifications are provided in real time and handled by the web browser you are using. To this effect, a unique identifier will be stored in your browser. We process data of your approximate geographic location data, among others, to provide you with information about the weather at your location, traffic information, presenting advertisements for restaurants nearby.

In addition, to perform statistical measurements, we use technologies coming from our Trusted Partners, in particular Google Analytics.T he above entities place special codes on your end devices that allow us to collect data used to count statistics and optimize our Services.

At any time a User may object to the collection of data by Google Analytics by changing web browser settings.

You may also prevent Google Analytics from having access to information about your activity on our website using the solutions available here:

- https://tools.google.com/dlpage/gaoptout

In many cases, a web browser by default allows the storage of information in the form of cookies and other similar technologies on the User's end device. A User may, however, change these settings at any time. A failure to make changes means that the aforementioned information may be placed and stored, and thus that we will store information on the user's end device and access that information.

Comprehensive information is available in the browser settings:

- Internet Explorer
- Mozilla Firefox
- Chrome
- Opera
- etc.

Please be advised that restricting or disabling the use of cookies and other similar technologies may affect some of the functionalities available in our services.

Please keep in mind that:

- when you use the same computer together with other users, when you finish using the Services to which you are logged in, make sure to log out, i.e. "exit" your settings so that no one may see them;
- the data you provided at registration is known only to you and GO.PL. For our part, we guarantee that the data will not be disclosed to anyone, and you should also exercise caution when sharing it with third parties;
- it happens that people using the web want to obtain information about you and use it against you or others. Be careful. Make sure that you know who the person asking you for personal data is and what kind of institution they represent.

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