

## **Privacy Policy**

### **Vasco Audience**

The following privacy policy (hereinafter: “Policy”) provides information about the processing of your personal data related to the use of the Vasco Audience web application. Please read the Policy before you start using the application.

#### **I. Data Controller**

The controller of user personal data is Vasco Electronics Góralski Group Spółka Komandytowo-Akcyjna based in Cracow, Al. 29 listopada 20, 31-401 Cracow, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Cracow Śródmieście in Cracow, XI Economic Division of the National Court Register under KRS number 0000421705, with a share capital of PLN 50,000.00, paid in full, Tax Number: 6772369151 (hereinafter: “Data Controller”).

#### **II. Data Controller's contact information**

In cases related to the processing of personal data, you can contact the Data Controller by email at: [gdpr@vasco-electronics.com](mailto:gdpr@vasco-electronics.com)

#### **III. Data processed in relation to the use of Data Controller web application**

In connection with the use of the web application, the Data Controller may process the following user data:

- 1) **identification data** - user name. At the same time, the Administrator indicates that it is not required that the username contains any personal data, in particular, such as first name or last name.
- 2) **translation language** selected by the user;
- 3) **content published by the user in connection with the use of the application including its translation;**
- 4) **information about the device** - such as phone model, manufacturer, processor, memory and battery details of the device, approximate location, language and region, operating system, operating system version etc.
- 5) **information about the application** - such as name, version and permissions of the application, etc.
- 6) **error data** - such as type and details of the error, user ID, IP address, estimated location, language and region, actions performed by the user in the application, information on updates, etc.
- 7) **analytical data related to the fact of using the application** - device model, device operating system, user activity within the application, average user engagement time, page and screen views, etc.

#### **IV. Purpose and basis for data processing**

Use of the web application involves processing of user personal data by the Data Controller. Below you will find detailed information on the purposes and legal grounds for the data processing.

Purposes and legal basis of data processing:

- 1) **conclusion and performance of a contract for the provision of translation services** - Article 6(1)(b) GDPR. The processing is necessary for the performance of a contract for the provision of translation services provided by the web application, concluded with the data subject, or for taking steps to conclude such a contract. Provision of data is voluntary, although necessary for the use of the web application;

- 2) **administration and maintenance of the web application** - Article 6(1)(f) of the GDPR, which is the Data Controller's legitimate interest in ensuring the continuity of the service, detection and debugging to improve the security of the application;
- 3) **analysis and statistics on users' use of the web application** - Article 6(1)(f) of the GDPR, which is the Data Controller's legitimate interest in creating and analyzing statistics related to users' activity in order to improve the functionality of the application through the development of new features and the improvement of the existing ones, as well as to identify users' needs.

#### V. Data retention period

DATA CATEGORIES	RETENTION PERIOD
Identification data	30 days
Translation language	30 days
Content published by the user in connection with the use of the application including its translation	<b>until the session is closed by the meeting/lecture leader</b>
Information about the device	90 days
Information about the application	90 days
Error data	90 days
Analytical data	14 months
Server logs	30 days

#### VI. Data security

In accordance with the requirements set forth in Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (the “General Data Protection Regulation”) (hereinafter: “GDPR”), the Data Controller implements a number of technical and organizational measures to ensure the security of your personal data.

#### VII. Data Recipients

The Data Controller may provide user data to the following categories of recipients to entities providing IT services to the Data Controller, technical infrastructure provider, translation service providers, mobile and web application development platform provider, user activity analysis tool provider, monitoring and error analysis provider.

In particular cases, user personal data may also be disclosed to entities, authorities or institutions entitled to access the data under the law.

## VIII. Profiling

Users will not be subject to decisions that are based solely on automated processing of your personal data, including profiling, which produces specific legal effects on you or otherwise materially affects you.

## IX. User's rights related to data processing

In connection with the processing of your personal data, user has the following rights:

- 1) access to user personal data;
- 2) correction of personal data;
- 3) deletion of personal data;
- 4) restriction of personal data processing;
- 5) object to the processing of personal data (the user has the right to object in case of processing based on the legitimate legal interest of the Data Controller)

In order to exercise your rights specified in points 1-5 above, please contact the Data Controller by e-mail, at the following address: [gdpr@vasco-electronics.com](mailto:gdpr@vasco-electronics.com)

In addition, you also have the right to file a complaint with the data protection supervisory authority.

## X. Cookies

The Data Controller informs that the web application uses cookies. The terms of using cookies within the Data Controller's web application are defined below. Cookies are small text files saved and stored on the user's end device when the user uses the web application.

## XI. Types of cookies

Based on the storage period of information contained in cookies, the Data Controller uses the following types of cookies:

- 1) **session cookies** - stored on the user's end device until , leaves session/website or turns off the web browser.
- 2) **permanent cookies** - stored in the user's end device for the time specified in the parameters of cookies or until they are deleted by the user.

## XII. Purposes for using cookies

The Data Controller uses cookies for the following purposes:

- 1) **maintaining the user's session** - in order to provide the user with easier and faster access to the web application. Cookies are stored on the user's end device for a period of 30 days from the date of the last use of the web application or until they are cleared by the user;
- 2) **providing security** - cookies are used to prevent unauthorized access to the meeting/lecture;
- 3) **creating statistics and analysis** - in order to understand user usage of the web application and to improve and customize it according to user needs and preferences;
- 4) **corrections and improvements of the web application** - in order to enable error detection, their removal and continuous improvement of the web application by the Data Controller.

### **XIII. Third-party cookies**

As part of the web application, the Data Controller uses the following third-party cookies:

- 1) **Google LLC** provides Google Analytics tool, enabling the collection of statistical data about how users use the web application.
- 2) **Sentry.io** provides an error monitoring tool

### **XIV. Basis for using cookies**

The Data Controller uses cookies based on the user's consent. The only exception in this regard may be cookies necessary for the proper functioning of the web application. The user can change its preferences regarding cookies at any time.

### **XV. Cookies management**

As a user, you have the ability to control your privacy by choosing which cookies you want to accept and which to block. Here are some tips on how you can manage cookies. However, disabling or restricting cookies, may cause certain difficulties in the use of the web application.

#### **1. Manage cookies from your web browser**

Web browsers provide many ways to control cookies that are stored on end devices. For example, the user can block cookies or allow cookies. In addition, from within the web browser, the user can also manage the cache data that is stored in the browser, including cookies.

How to manage cookies from within the most commonly used web browsers:

- 1) **Google Chrome** - Select Browser Menu > “Settings” > “Privacy and Security”
- 2) **Microsoft Edge** - Select Browser Menu > “Settings” > “Privacy and Security” > “Cookies and Site Permissions”
- 3) **Mozilla Firefox** - Select Browser Menu > “Settings” > “Privacy and Security” > “Cookies and Site Data”
- 4) **Safari** - Select Browser Menu > “Settings” > “Preferences” > “Privacy”

#### **2. Manage cookies from the cookie banner**

The user can also manage cookie consents from the cookie banner provided by the Administrator.

### **XVI. Changes in Privacy Policy**

The Data Controller reserves the right to change the Policy in the case of changes in applicable laws or in connection with technological development of the web application, which may affect the processing of user data.