

Information on the processing of personal data of users of our websites or mobile application:

Data Controller: Benefit Systems S.A. with its registered office in Warsaw, Plac Europejski 2, 00-844 Warsaw (hereinafter referred to as 'we' or 'Benefit Systems'). The controller may be contacted by e-mail at daneosobowe@benefitsystems.pl or in writing at the following address: Pl. Europejski 2, 00-844 Warsaw, in an envelope marked 'Dane osobowe' [personal data].

Data Protection Officer: You can contact our Data Protection Officer on matters relating to data protection in the following manner: by post at the following address: Pl. Europejski 2, 00-844 Warsaw, in an envelope marked 'IOD', via e-mail: iod@benefitsystems.pl and via contact form at <https://www.benefitsystems.pl/formularz-dane-osobowe/>.

Scope of data processed We will process your personal data and, if you have provided it to us, your child's personal data, to the extent specified in the forms you have filled in.

We also process the data you provide when you use your account on our websites and our mobile application, as well as data concerning your activity on our websites and in our application (e.g., data about pages you visit, bookmarks, how much time you spend there, etc.).

Furthermore, in accordance with the Terms and Conditions of Electronically Supplied Services of Benefit Systems S.A., if you use the facility search engine and turn on the geolocation function, we will process your geolocation data in order to show you facilities located near your location.

If you upload your or your child's photo to our application in order to obtain a Confirmed Identity, we will process it to guarantee you or your child the Confirmed Identity functionality and in order to send it back to your e-mail address if you would like to use facility services while a QR code or token number cannot be generated in the app.

We will also process data relating to your device through which you use our websites or applications: IP address, data stored in cookies or other similar technologies (see: '[Policy on cookies and other similar technologies](#)'). We also process data comprising contents of HTTP requests transmitted from your device to our server (URL, IP address, browser data, date and time of the request, HTTP response code, error information, cookie ID, page resources viewed). The data so collected are recorded in server logs.

Purposes and legal bases for processing: We will process your personal data and, if you have provided it to us, your child's personal data, for the purposes of:

- providing access services and account maintenance services on our websites and in our mobile application – because it is necessary for the performance of the contract between you and Benefit Systems, i.e. the contract on electronically supplied services in accordance with the Terms and Conditions of the provision of electronically supplied services by Benefit Systems S.A. (legal basis – Article 6(1)(b) GDPR);
- where we collect special categories of data in order to provide you with a service, we process your data on the basis of your explicit consent (legal basis – Article 9(2)(a) GDPR). The provision of this data is always voluntary, but may be necessary in order to use the service in question;
- related to compliance with our legal obligations – we may have obligations arising from applicable laws that require us to process your personal data; in particular, this concerns compliance with tax and accounting obligations (legal basis – Article 6(1)(c) GDPR);
- server administration and security assurance for statistical purposes and for the purposes of facilitating the use of our websites and mobile application on the basis of our legitimate interest consisting in improving the functionality of services provided by us electronically (legal basis – Article 6(1)(f) GDPR);
- exercising, establishing or defending legal claims. We act on the basis of our legitimate interest consisting in the ability to establish or defend a legal claim (legal basis – Article 6(1)(f) GDPR);
- in connection with carrying out marketing activities – we may process your personal data: (i) for the purposes of marketing communications, including mailing commercial information and presenting offers in pursuit of our legitimate interest that consists in presenting you with marketing contents, including contents tailored to you on the basis of profiling, in connection with your consent to use the communication channel you have chosen for this purpose; ii) for the purposes

of online marketing activities in pursuit of our legitimate interest that consists in presenting advertisements and offers, including those tailored to your potential needs and interests on the basis of profiling, in connection with your consent to the use of cookies or similar technologies or, where applicable, in connection with your consent to our use of information on your location for marketing purposes; iii) for the purpose of carrying out analyses and statistics for marketing purposes and for the purpose of surveying satisfaction with our services in pursuit of our legitimate interest that consists in improving the quality of our customer service and optimizing the products and services offered by us (legal basis – Article 6(1)(f) GDPR).

Data recipients: Your personal data may be transferred to the following entities: Benefit Systems Group companies, hosting and maintenance service providers for our websites and mobile application, ICT and IT support and security service providers, data storage and destruction service providers, entities providing services for our clients and other stakeholders (e.g. couriers), and supporting our marketing activities, as well as to legal counsels and auditors. Your data may also be transferred to our affiliated entities that offer additional services in connection with your ownership of an account on our website or in our mobile application, as well as to social network operators.

Your data may also be transferred to public authorities in cases provided for by law.

If you use the function of making the Virtual Kids Card available to other users registered in our application, your child's personal data will be disclosed to the users indicated by you.

Transfers outside the EEA: As a rule, your personal data are not transferred outside the European Economic Area (EEA). Should such a transfer occur, we will make reasonable efforts to have appropriate safeguards in place. In such case, you can contact us to obtain copies of the implemented security measures. You will find our contact details above.

Period of processing: After you have finished using our websites or mobile application, we will process your data for as long as they are stored in the server logs. If you have an account on our websites or in our application, we will keep your data until you delete your account.

Where we process your data for the purposes of complying with our legal obligations, we will do so for the time necessary to comply with our legal obligations, in particular as required by applicable law.

Where we process your personal data based on our legitimate interests, we will do so until you lodge an effective objection or, alternatively, until the expiry of the limitation period for claims.

Source of data: We obtain your data directly from you. We may also obtain your data from entities that offer you additional services in connection with your ownership of an account on our websites and in mobile application (e.g. MultiLife Diet, Focusly, etc.) or from providers of external authentication services (e.g. Facebook, Apple).

Your rights in relation to the processing of your personal data: Right to request access to personal data, right to request rectification of personal data, right to request erasure of personal data, right to request restriction of personal data processing, right to object to the processing of personal data, right to data portability, right to withdraw consent to personal data processing, and right to lodge a complaint with the President of the Personal Data Protection Office.

Provision of data: As a rule, providing personal data is not compulsory, but may be necessary for you to use the services provided by Benefit Systems, e.g. to enter into a contract with us. Therefore, your failure to provide your data may in some instances make it impossible for us to provide services. Our forms used to collect data clearly indicate the data the provision of which is necessary.

Automated decision-making: We do not make any decision concerning you which would be based solely on automated processing of your information which would produce legal effects concerning you or similarly affect you in a significant way.

Specific information about the processing of your personal data can be found in our Privacy Policy: <https://www.benefitsystems.pl/en/privacy-policy/>.