

TRAFFICWATCHDOG PRIVACY POLICY

(hereinafter: "**Privacy Policy**")

I. GENERAL PROVISIONS

1. This Privacy Policy of TrafficWatchdog.pl (hereinafter referred to as the "**Service**"), owned by Spark DigitUP Sp. z o.o. with its registered office in Krakow, Plac Wolnica 13 lok. 10, 31-060 Kraków (hereinafter: "**TrafficWatchdog**") is addressed to the users of the Website, including clients and potential clients of TrafficWatchdog, and also, in case the client concludes an agreement with TrafficWatchdog for the provision of electronic services - also to its employees or other persons used by the client, whose data was provided by the client to TrafficWatchdog (hereinafter: "**User**"), and determines the type, scope, ways of using personal data, rights and obligations of the User and the security of personal data. Failure of the User to accept the provisions and rules arising from this Privacy Policy shall be equivalent to the inability to use the services of the Website and the need for the User to leave the Website.
2. The administrator of Users' personal data (hereinafter referred to as "**Personal Data**") - is Spark DigitUP Sp. z o.o. located in Krakow, Plac Wolnica 13 lok. 10, 31-060 Krakow, NIP 6762496391, registered in the District Court of Krakow-Śródmieście, XI Economic Department of the National Court Register under KRS number 0000587711, REGON 363042916, share capital PLN 205,000.00 fully paid up. Contact with the administrator is possible via e-mail address: kontakt@trafficwatchdog.pl, contact form available on the website: www.trafficwatchdog.pl or in writing to the administrator's registered office address indicated above.
3. The Personal Data referred to in the Privacy Policy is information about an identified or identifiable natural person to whom the data relates, i.e. one who can be directly or indirectly identified, in particular on the basis of a characteristic such as name, identification number, location data, Internet identifier or one or more characteristics that define the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.
4. Personal Data - is processed by TrafficWatchdog in accordance with applicable regulations, in particular Polish law and the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation - hereinafter: "**GDPR**").
5. Processing, as defined in the Privacy Policy, means an operation or set of operations performed on Personal Data or sets of Personal Data in an automated or non-automated manner, such as collecting, capturing, organizing, structuring, storing, adapting or modifying, downloading, viewing.
6. You may browse the Service without entering your Personal Information into the Service or registering, subject to the provisions of Section. II.A. A below ["**Automatically Collected Data**"].

II. SCOPE, PURPOSE AND BASIS FOR COLLECTION AND PROCESSING OF PERSONAL DATA

A. Data collected automatically

1. During a User's use of the Website, data regarding the User and visits are automatically collected and processed. These data include: IP (Internet Protocol) address, basic information about the computer device that is used to access the Website, identifier - which is assigned to the device from which visits are generated, parameters of the end device, parameters of the

operating system, parameters of the browser, general geographic location of the visit, how the User interacts with the Website and activity data on the Website, time on the Website, HTTP header parameters, parameters of the marketing campaign. This data may be collected by cookies ("cookies"), Google Analytics system and Google re-Captcha system. This data is collected and processed for the purpose of identifying ad fraud marketing, creating reports and analyses, collecting demographic data about Users and for personalizing the content of the Service.

2. The cookies referred to in II.A. 1 above are files sent to the User's computer or other device when browsing the Website.
 - 2.1 Cookies remember the User's preferences, which makes it possible to improve the quality of the Website and services provided electronically through the Website, create viewing statistics, track User preferences, maintain a logged-in User session.
 - 2.2 Cookies do not cause configuration changes in the device or software installed in the User's device.
 - 2.3 The User may refuse to consent to the use of cookies (blocking cookies), which will prevent the storage of cookies on the User's device in the future.
 - 2.4. the User who does not consent to the use of cookies (will apply blocking of cookies) should choose the appropriate settings in the web browser used by the User. The process of consenting to the use of cookies varies depending on the browser used by the User.
 - 2.5 The User who wants to delete existing cookies should choose the appropriate settings in the web browser he/she is using or delete cookies manually. The process of deleting cookies varies depending on the browser used by the User.
 - 2.6 Blocking or deleting cookies may impede the use of the Website, and in some cases prevent the use of some of its options.
 - 2.7 Third-party cookies may be used in advertisements posted on the Website to enable analysis of the effectiveness of the advertising campaign of these entities. This Privacy Policy does not regulate the use of the cookie mechanism by third parties.
3. Google Analytics, referred to in Section II.A.1 above, is an analytics system that provides insight into the traffic data of the Website and the demographics of Users, used for analytical and marketing purposes. For more information on the terms of use and data protection applied by Google Ireland Limited, registered and operating under the laws of Ireland (registration number: 368047), based at Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: "Google") - please visit the following website <https://policies.google.com/terms?hl=pl> and <https://policies.google.com/privacy?hl=pl>.
4. Google re-Captcha, referred to in Section II.A.1 above, is a traffic verification system used to detect and protect the Website from spam and marketing abuse. For more information on the terms of use and data protection used by Google, please visit the following website <https://policies.google.com/terms?hl=pl> and <https://policies.google.com/privacy?hl=pl>
5. In the case of the User's use of the chat form available on the Website in exceptional cases related to the provision, support or improvement of services, or in cases provided by law, the User's data (to the extent specified in Section. II A.1 and to the extent voluntarily provided by the User) may be transferred to third countries outside the EEA. In this case, data transfers will be secured by means of agreements with the service provider as the receiving party, containing standard data protection clauses adopted by the supervisory authority and approved by the European Commission.

B. Data collected in the course of registration and after logging into the Service

1. Contact form - if the User fills out the contact form on the Website, the following Personal Data is collected and processed: name, email address, phone number, IP address. The data is collected and processed in order to carry out contact with the User and provide assistance to the User. The basis for this processing is Article 6(1)(b) of the GDPR. If the User gives permission on the contact form to process his/her personal data for marketing purposes (by giving the appropriate consent), the User's data will then be collected and used for the purposes of presenting an offer, conducting contests and other marketing activities. If the User gives permission on the contact form to process his/her personal data for the purpose of receiving commercial information (by expressing appropriate consent), the User's data will then be collected and used for the purpose of receiving commercial information. The basis for this processing is Article 6(1)(a) of the GDPR.
2. Registration of an account on the site - in accordance with the Terms of Service, the condition for the establishment of a Customer Account or Demo Account by the User is registration and provision of User data - the following Personal Data are collected and processed: e-mail address, password, IP address. The basis for this processing is Article 6 (1) (b) GDPR.
3. Conclusion of contracts through or available on the Website - the following Personal Data is collected and processed: name, address, Tax ID, email addresses, contact phone number. The basis for this processing is Article 6(1)(b) of the GDPR.
4. Fulfillment of obligations relating to agreements concluded on or through the Service and the operation of the Service - the following Personal Data are collected and processed: name, address, Tax ID, email addresses, contact telephone number. The basis for this processing is Article 6 (1) (b) GDPR.
5. Google Ads account data - some of the implemented services require access to the User's Google Ads account. This access is required in order for the Service's robots to add and remove IP addresses to exclusion lists in Google Ads campaigns, and to add and remove a tracking template in the User's Google Ads account. The Service does not require a Google Ads User name or password - access is granted by approving the access request for the Service. The following Personal Data is collected and processed - the User's Google Ads account ID. The basis for this processing is Article 6 (1) (b) GDPR.
6. Monitoring of behavior and identification of marketing abuse on the Website, analysis of Internet traffic, ensuring IT security of the Website, conducting statistics, diagnoses and analysis - the following Personal Data are collected and processed: IP (Internet Protocol) address, basic information about the computer device that is used to access the Service, identifier - which is assigned to the device from which visits are generated, parameters of the terminal device, parameters of the operating system, parameters of the browser, general geographic location of the visit, how the User interacts with the Service and activity data on the Service, time on the Service, HTTP header parameters, parameters of the marketing campaign. This data may be collected by cookies ("cookies"), Google Analytics system and Google re-Captcha system. The basis for this processing is Article 6(1)(f) of the GDPR.
7. Investigation of claims or defense against such claims related to the operation of the Service or services provided electronically - the following Personal Data are collected and processed: name, address, Tax ID, email addresses, contact telephone number.
8. Fulfillment of the obligation to store data, documents, accounting evidence - the following Personal Data are collected and processed: name, address, Tax ID, email address, contact telephone number.
9. In the event that the User places personal data of the User's employees or other persons handled by the User in the Account or elsewhere on the Website, it is the User's responsibility to inform the subjects of such data, to acquaint the subjects of such data with this Privacy

Policy, and to collect written statements from such persons that they have acquainted themselves with the contents of the Privacy Policy and to submit signed statements from the subjects of such data to TrafficWatchdog upon any request within no more than 3 days from the date of such request.

III. SOCIAL NETWORKS

1. The Service contains links (links) to external social networking sites ("Social Plugins") such as Facebook, owned by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA (hereinafter: "**Facebook**").
2. The functions assigned to the individual links, in particular the transfer of information and Personal Data, are activated only after clicking on the link. At that time, the so-called social plug-in (plug-in) of the individual social network is activated, and then the User's browser will connect the User directly to that social network.
3. If a User clicks on a selected link while visiting the Service, there is a transfer of his/her Personal Data and its processing by a given social network. If during a visit to the Service the User clicks on a selected link while logged in to the given social network, the transfer of information about the visit to the Service and the recording of this fact in the User's account on the given social network may occur through the User's account. To avoid such an action, you should log out of your account on the given social network before clicking on the given link. For more information on data processing by Facebook, for example, please visit <https://www.facebook.com/about/privacy/>.
4. The information provided is usually the so-called public profile as defined by the social network whose plug-in the User clicks when visiting the Service. A comment published on the Service using a social plugin will be available to the public. For example, if a User publishes a comment using Facebook's comment plugin, the event will be public and everyone will have access to it.
5. The purpose and scope of the processing of Personal Data by social networking sites, as well as the related rights and obligations of the administrator of such a site for the protection of Users' privacy - Users will find in the tab on the protection of personal data of that site (e.g., for Facebook, information on the processing of personal data can be found at <https://www.facebook.com/about/privacy/>). The respective social network is responsible for the processing of data that is triggered when clicking on a link.

IV. PERIOD OF PERSONAL DATA PROCESSING

1. Personal Data collected on the Site to the extent justified by the purposes of processing will be stored and processed for as long as there is a legal basis for their processing. In the case of the conclusion of an agreement for the provision of services by electronic means, Personal Data will be processed for the duration of that agreement, and thereafter for as long as the legal provisions on the statute of limitations for claims arising from that agreement and until the expiration of the obligation to store data, documents and accounting evidence arising from applicable laws. At the end of the retention period, the Personal Data will be deleted or anonymized.

V. VOLUNTARINESS OF PROVIDING PERSONAL DATA

1. Provision of Personal Data on the Service is voluntary, but necessary to carry out one or more of the purposes of processing Personal Data as defined in Section. II above.

VI. RIGHTS AND OBLIGATIONS OF TRAFFICWATCHDOG

1. TrafficWatchDog reserves the right to disclose selected Personal Data to competent authorities or third parties who make a request for such information, based on the relevant legal basis, in accordance with the provisions of applicable law.
2. TrafficWatchdog may entrust the processing of Personal Data, on the basis of a written agreement concluded in accordance with applicable regulations, to entities providing services to TrafficWatchdog.

VII. PROCESSING OF PERSONAL DATA BY PROCESSORS

1. Processors as defined in the Privacy Policy are entities that process Personal Data on behalf of TrafficWatchdog.
2. The Processor is authorized and entitled to process Personal Data only for the purposes and to the extent specified in the Privacy Policy.
3. Personal Data may be processed only in Poland, a member state of the European Union (EU) or a signatory to the European Economic Area (EEA) Agreement.
4. The Processor shall process the entrusted Personal Data in accordance with applicable laws and regulations, in particular the Processor:
 - a) applies the technical and organizational measures required by law, in particular with regard to the security of the processing of Personal Data,
 - b) has measures in place to ensure: i) the ability to continuously ensure the confidentiality, integrity, availability and resilience of processing systems and services; ii) the ability to quickly restore the availability of and access to personal data in the event of a physical or technical incident; iii) regular testing, measurement and evaluation of the effectiveness of technical and organizational measures to ensure processing security,
 - c) applies security measures for Personal Data at a level not lower than that applied by TrafficWatchdog,

VIII. RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA SUBJECT

1. Each User has the right:
 - a. access to your Personal Data, the right to rectification, deletion and the right to request restriction of processing,
 - b. object to the processing of your Personal Data, revoke your consent to the processing of your Personal Data for one or more of the purposes for which it was granted, at any time without affecting the lawfulness of the processing carried out on the basis of your consent prior to its revocation, as well as the right to transfer your Personal Data.
2. In order to exercise the rights referred to above - please send an e-mail to: kontakt@trafficwatchdog.pl, use the functionalities provided in the Client's Account, click on the link causing withdrawal of consent placed in the content of commercial information or send written information to the address: Spark DigitUP Sp. z o.o., Plac Wolnica 13 lok. 10, 31-060 Kraków.
3. If you post any personal information of others (including their name, address, phone number or e-mail) on the Service, you may do so only under the condition that you do not violate the provisions of applicable law and the personal rights of such persons.
4. Each User has the right to file a complaint with the supervisory authority for the processing of Personal Data.

IX. SECURITY OF PERSONAL DATA

1. TrafficWatchdog declares that it endeavors to provide Users with a high level of security in the use of the Service and to this end:

- a) applies the technical and organizational measures required by law, in particular with regard to the security of the processing of Personal Data,
- b) applies measures to ensure: i) the ability to continuously ensure the confidentiality, integrity, availability and resilience of processing systems and services; ii) the ability to quickly restore the availability of and access to Personal Data in the event of a physical or technical incident; iii) regular testing, measurement and evaluation of the effectiveness of technical and organizational measures to ensure processing security.

X. FINAL PROVISIONS

1. In matters not regulated in the Privacy Policy, the provisions of the law on the processing of Personal Data, including the GDPR, shall apply.

XI. CONTACT

1. If you have any additional questions regarding the Privacy Policy, please contact us at kontakt@trafficwatchdog.pl.
2. The rules set forth in the Privacy Policy are governed by Polish law.
3. TrafficWatchdog shall be entitled to unilaterally amend the Privacy Policy in the event of the occurrence of: (a) a change in applicable laws applicable to the operation of the Service or the provision of electronic services (b) a change in the Service's offer of services, provided that changes to the Privacy Policy are intended to align the content of the Privacy Policy with the offer and its terms.