

WEBSITE PRIVACY POLICY

1. GENERAL PROVISIONS.

- 1.1. For the sake of preserving the privacy rights of the Users of the Website run by the Website Administrator and to fulfil the requirements of the law, the Website Administrator provides the Website Users with this Privacy Policy, in which it explains and informs them of the manner in which the Users' personal data is processed and secured, and furthermore sets out the Users' rights and options in this regard.
- 1.2. The Website Administrator processes personal data in accordance with the applicable legislation, including the GDPR and the Act of 18 July 2002 on Providing Services by Electronic Means (Journal of Laws of 2002, No. 144, item 1204, as amended).
- 1.3. The User should read the Privacy Policy before using the Website.

2. DEFINITIONS.

- 2.1. Capitalised terms in this Policy shall have the following meaning:
 - 1) **Privacy Policy** – this Privacy Policy;
 - 2) **Website Administrator** – Well Invest Spółka Akcyjna with its registered office in Warsaw, address: ul. Posag 7 Panien, 02-495 Warsaw, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under KRS No.: 0000692543, REGON: 368192371, NIP: 1231367385, BDO: 000591507, share capital of PLN 5,079,673.00, paid in full.
 - 3) **User** – a natural person whose personal data is processed by the Website Administrator in connection with the use of the Website;
 - 4) **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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;
 - 5) **Website** – the website operated by the Website Administrator available at: www.well-well.eu;
 - 6) **Cookie** – a file downloaded onto the User's computer when accessing certain websites;

3. DATA COLLECTION AND PROCESSING.

- 3.1. The Website Administrator is the controller of the personal data provided by the User when using the Website.
- 3.2. As a result of using the Website, the Website Administrator may process in particular the following personal data:
 - contact details: full name, e-mail address, telephone number,
 - technical data including information collected during visits to our websites, Internet Protocol (IP) address, login data, browser type and version, device type, time zone settings, browser plug-in types and versions, operating system and operating platform.
- 3.3. In connection with the User's use of the Website, the Website Administrator collects data to the extent necessary to provide the individual services offered, as well as information about the User's activity on the Website. The detailed principles and purposes of the processing of personal data collected during use of the Website by the User are described below.

4. PURPOSES AND LEGAL BASES OF DATA PROCESSING.

- 4.1. The Website Administrator processes the personal data of Website Users for the following purposes:
 - 4.1.1. providing information about its activities (pursuant to Article 6(1)(f) of the GDPR - legitimate interest of the Website Administrator, i.e. contacting Users) Personal data is processed to identify the sender and to handle their query sent via the contact form.
 - 4.1.2. marketing activities and improving services (pursuant to Article 6 (1) (f) GDPR - pursuit of the legitimate interest of the Website Administrator, i.e. improving its services, ensuring their best quality and adjusting marketing information to the interests of Users). The Website Administrator processes personal data to measure and improve content and services, including tailoring content to Users' interests.
 - 4.1.3. fulfilment of the Website Administrator's legal obligations (pursuant to Article 6(1)(c) of the GDPR). The Website Administrator processes data if this is necessary for the fulfilment of legal obligations.
 - 4.1.4. ensuring the security and functionality of the Website (pursuant to Article 6(1)(f) of the GDPR - pursuit of the legitimate interest of the Website Administrator, i.e. ensuring the operation of the Website and the high quality of services). The Website Administrator processes personal data where this is necessary to ensure the security of information processing and the management of ICT systems.
 - 4.1.5. asserting or protecting against possible claims (pursuant to Article 6(1)(f) of the GDPR - pursuit of the legitimate interest of the Website Administrator, i.e. protection against claims or asserting claims). In the event of possible claims against Users or the need to protect against claims, the Website Administrator may process User data obtained through the Website.

5. DATA ACCESS.

- 5.1. The Website Administrator may provide access to personal data of Users at the request of public authorities or other entities authorised to such access by law, in particular when it is necessary to ensure the security of the systems or the rights of other Users, and also at the request of Users or when it is necessary for the performance of services offered by the Website Administrator.
- 5.2. User data may be accessed by entities whose services are used by the Website Administrator to provide services to Users (e.g. Website hosting entities). In such cases, the Website Administrator has entered into appropriate agreements with these entities to protect User data against unauthorised access.
- 5.3. Some of our service providers may store User data outside the European Economic Area. In such cases, User data may be stored in countries that provide an adequate level of personal data protection or in countries that do not provide such a level. In the latter case, the Website Administrator secures User data by entering into agreements with service providers containing the so-called Standard Contractual Clauses accepted by the European Commission, which provide a guarantee of adequate protection of User data in third countries, or uses other bases for the transfer of personal data.

6. USER RIGHTS.

- 6.1. The User shall have the following rights in relation to their personal data processed by the Website Administrator within the Websites:
- the right to access personal data;
 - the right to rectify personal data;
 - the right to withdraw consent in whole or in part at any time;
 - the right to erase personal data;
 - the right to restrict personal data processing;
 - the right to data portability;
 - the right to object to the processing of personal data.
- 6.2. To exercise the above rights contact can be made electronically at: rodo@cpfpoland.pl
- 6.3. If a breach of data protection legislation is deemed to have occurred, the User has the right to lodge a complaint with the President of the Personal Data Protection Office.

7. DATA RETENTION PERIOD.

- 7.1. The Website Administrator shall only retain Users' personal data for such time as is necessary to fulfil the purposes for which the data was collected. After this time, the data is deleted or anonymised in such a way that the User's identity cannot be determined.
- 7.2. Personal data may be retained longer if such an obligation arises from the law or is necessary for the Website Administrator to defend or assert claims against Users.
- 7.3. Data processed on the basis of consent will be processed until its withdrawal.

8. COOKIES.

- 8.1. The Website uses Cookies, which include:
- the name of the server from which the Cookie was sent;
 - Cookie duration;
 - Cookie value (usually a randomly generated unique number).
- 8.2. The Website that sent the Cookie uses this number to recognise the User when they return to the site or browse from page to page. Only the Website that sent the Cookie can read and therefore use this Cookie.
- 8.3. The Website Administrator uses Cookies for the following purposes:
- creating statistics that help to understand how Users use web pages, which may lead to improvement of their structure and content;
 - maintaining the User's session (after logging in), thanks to which the User does not have to re-enter the login and password on each subpage.

9. TYPES AND DURATION OF COOKIES.

- 9.1. The Website uses several types of Cookies, including:
- 9.1.1. Google Analytics Cookies for monitoring website traffic, i.e. data analytics, including Google Analytics cookies (these are cookies used by Google to analyse how the Website is used by the User, to create statistics and reports on the functioning of the Website). Google does not use the data collected to identify the User, nor does it combine this information to enable identification. Detailed information on the scope and principles of data collection in connection with this service can be found at: <https://www.google.com/intl/pl/policies/privacy/partners>.
- 9.2. The User may authorise, refuse or disable Cookies at any time by changing browser settings. If the User deactivates a Cookie already installed in the browser, this Cookie

will no longer be active, but will not disappear from the browser until the end of its duration - withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal. Please note that blocking all Cookies may make part of the Website inaccessible to the User or may adversely affect the performance, efficiency or customisation of the Website.

- 9.3. The retention period of Cookies (i.e. Cookie expiry date) - analytical cookies shall not exceed 13 months, while information collected through them may be stored for a maximum of 25 months.
- 9.4. Each browser is configured differently. Follow the instructions provided by the browser publisher.

10. CHANGES TO THE PRIVACY POLICY.

- 10.1. The Website Administrator places the most up-to-date version of the Privacy Policy in the footer of the Website.