

PRIVACY POLICY

The current version of the policy is valid from 19.05.2022

I. INTRODUCTION

1. GGPREDICT sp. z o.o. as the owner of the website www.ggpredict.io respects privacy and takes special care in the protection of personal data.
2. This document is deemed to be indicative only and can not be a source of any obligations for the Website's users.
3. The Privacy Policy contains the rules for the processing of Personal Data, including the legal basis, the purposes and scope of processing Personal Data, as well as the rights of data subjects.
4. Beyond the information indicated in point 2 above, all information regarding cookies and analytical tools used by GGPREDICT sp. z o.o. on the Website can be found in the Cookies Policy available at: <https://ggpredict.io/cookies-policy>.
5. If You have any questions, doubts or complaints regarding the processing of Your Personal Data and its privacy, please contact us choosing the most convenient way indicated in point IV of the Privacy Policy.

II. DEFINITIONS

For the purposes of this Privacy Policy, all terms written with capital letters, such as e.g. Agreement, Service etc. shall have meanings given to them in the Terms and Conditions available here (<https://ggpredict.io/terms> - Chapter: Definitions), unless the Privacy Policy defines them otherwise below:

- **Act on the Protection of Personal Data** – act from May 10, 2018 on the protection of personal data (Dz.U. 2018.1000).
- **Anonymous Data** - information through which a natural person can not be identified, including, but not limited to, information about the time spent on the Website, operating system, web browser or approximate location.
- **Controller or We** - an entity providing the Service to the Users: GGPREDICT sp. z o.o. (a limited liability company) with its registered office in Warsaw at 17a/65 Jugosłowska Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Warsaw in Warsaw, XII Commercial Division of the National Court Register under the KRS number 0000810173, NIP (tax identity number): 1133005669, REGON (statistical number): 384701481, with share capital amounting to PLN 12,400.00.
- **Cookies Policy** – a document with all information regarding cookies and analytical tools used by the Controller on the Website available at: <https://ggpredict.io/cookies-policy>.

- **Data or Personal Data** - any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **GDPR** - Regulation 2016/679 of the European Parliament and the European Council from April 27, 2016 on the protection of individuals with regard to the processing of personal data and free movement of such data, as well as repealing Directive 95/46/WE (General Data Protection Regulation).
- **Profiling** - any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's preferences, interests, reliability, behaviour, location or movements.
- **Processing** - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Representative** - a personal data protection representative appointed by the Controller in order to represent the Controller in the scope of obligations under the GDPR, who should be contacted in all matters regarding the protection of Personal Data, including the implementation of the rights referred to in point IX of the Policy.
- **Terms and Conditions** – regulations for the provision of electronic services by GGPREDICT sp. z o.o. available here (<https://ggpredict.io/terms>).
- **You** - You, i.e. a natural person whose Data are being processed by us as the Controller (as defined in GDPR), in relation to your use of the Service.
- **Website** – the website www.ggpredict.io owns by the Controller.

III. THE CONTROLLER OF PERSONAL DATA

The Controller of Your Personal Data collected through the Website is a company GGPREDICT sp. z o.o. with its registered office in Warsaw at 17a/65 Jugosłowiańska Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Warsaw in Warsaw, XII Commercial Division of the National Court Register under the KRS number 0000810173, NIP (tax identity number): 1133005669, REGON (statistical number): 384701481, with share capital amounting to PLN 12,400.00.

As the Controller, we take care of Your Personal Data, processing them with due diligence and in accordance with applicable law, in particular the General Data Protection Regulation.

IV. CONTACT DETAILS

In all matters related to the protection of Your Personal Data, You can contact the Representative appointed by the Controller in one of the following ways:

1. in writing to the correspondence address: ul. 17a/65 Jugosłowiańska Street, 03-984 Warsaw;
2. by e-mail correspondence to the e-mail address: privacy@ggpredict.io.

V. COLLECTION AND PROCESSING OF PERSONAL DATA

The Controller collects and processes Personal Data of Users, persons participating in recruitment and other persons, if it results from the legitimate interest of the Controller or concluded contracts.

In order to use the Website, You are not required to provide any Personal Data, but as the Controller, we are entitled to collect data that will be voluntarily provided by You.

If You voluntarily decide to use the available functionalities of the Website (e.g. the Newsletter service), consent to the processing of Personal Data will be obtained by the Controller in accordance with the applicable provisions on the protection of personal data.

We will inform you about the collection and processing of Personal Data before their collection and processing.

We can obtain Your Data directly from You or from third parties (such as streaming sites or tournaments) that make gaming data publicly available.

The types and extent of Data We may collect about You as a user of the Website or as a professional gamer are subject to the availability of data in publicly available sources. We never collect Data from websites without the consent of the website administrator and against their stated policies, even though the data We collect is publicly available.

Below you will find a list of networks from which We take gaming statistics data:

- Steam (Valve Corporation)
- FACEIT Ltd.

In addition, data of persons visiting our Website may be collected via cookies (more information in this regard in the [Cookies Policy](#)).

The Website has been equipped with all systems and tools used to process Personal Data for the purposes indicated in point. VI of this Privacy Policy.

The Website is not used to obtain and process a special category of personal data referred to in article 9 GDPR (sensitive data). The Website does not obtain the data referred to in article 10 GDPR (regarding criminal convictions and prohibited acts).

The exact scope of the Personal Data processed by the Controller has been specified in point VI of the Privacy Policy, in relation to each of the purposes of processing.

VI. PURPOSES, LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA AND THEIR RETENTION PERIOD.

The Controller may process Your Personal Data if it is necessary for You to use the Website's functionality or for other purposes described in this Policy. Each time the purpose, legal basis, period of data processing, their scope and categories of recipients result from actions taken by the data subject.

	PURPOSE OF PROCESSING	SCOPE OF DATA PROCESSED	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
1.	Setting - up of an account on Website - conclusion and performance of Agreement (on providing services in electronic means)	If you decide to conclude the Agreement via the form available on the Website, we will process the following personal data: <ul style="list-style-type: none"> • User ID (login) • e-mail address, Providing this data is necessary for the performance of the Agreement concluded with the data subject or for taking steps to conclude it (contractual requirement). Processing may also include additional personal data, if You voluntarily include it in the text of the message.	<ul style="list-style-type: none"> • Article 6 (1) (b) GDPR – for the purpose of conclusion and performance of the Agreement 	Data regarding the conclusion of the Agreement will be processed for the time necessary to perform its subject, and then until the expiry of the limitation period for claims under the Agreement (3-6 years).
2.	Analysis of game statistics of registered Users	We will process the following personal data: <ul style="list-style-type: none"> • User ID (login) • e-mail address, 	<ul style="list-style-type: none"> • Article 6 (1) (b) GDPR – for the purpose of analysis game statistics in connection to performance of the Agreement 	Immediately after the completion of the provision of services to the User under the Agreement, but not later than within 30 days from the date of completion.
3.	Analysis of game statistic of esports players	We will process the following personal data: <ul style="list-style-type: none"> • Esport player's identification data (name or name and surname) • Esport players ID (nick) 	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in analyzing the results achieved by e-sport playersUntil an effective objection is raised or the purpose of their processing is achieved. in order to keep statistics and prepare pre-match analyzes published on the Website 	Until an effective objection is raised or the purpose of Data processing is achieved.
4.	Contact and handling request	If you decide to contact the Controller via e-mail address, we will process the following personal data: <ul style="list-style-type: none"> • Identification data (name or name and surname) • e-mail address, Providing this data is necessary for the sending an e-mail to You and for the	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in establishing contact in connection with the message sent by You 	In principle, correspondence is removed on an ongoing basis, at least once a month, except for correspondence which is subject to archiving in the event of securing the

		<p>implementation of the related purpose (contractual requirement). Processing may also include additional personal data, if You voluntarily include it in the text of the message.</p>	<ul style="list-style-type: none"> • After completing the contact, your personal data may be processed on the basis of art. 6 (1) (f) GDPR in order to implement the Controller's legitimate interest in archiving correspondence or establishing, pursuing, enforcing claims and defending against claims arising from the economic activity conducted by the Controller 	<p>Controller's interests. Archiving of correspondence in such situations is the legitimate interest of the Controller, pursuant to art. 6 (1) (f) GDPR and is stored for the period of limitation of claims – e.g. 3 years or 6 years.</p>
5.	<p>Receiving and sending correspondence in traditional paper form</p>	<p>If you decide to contact the Controller via traditional way (by courier or post), we will process the following personal data:</p> <ul style="list-style-type: none"> • Identification data • other data depending on the type of correspondence <p>Processing may also include additional personal data, if You voluntarily include it in the correspondence.</p>	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in establishing contact in connection with the correspondence sent by You • After completing the contact, your personal data may be processed on the basis of art. 6 (1) (f) GDPR in order to implement the Controller's legitimate interest in archiving correspondence or establishing, pursuing, enforcing claims and defending against claims arising from the economic activity conducted by the Controller 	<p>Depending on the type of correspondence but not longer than for the period of limitation of claims – e.g. 3 years or 6 years.</p>
6.	<p>Own marketing and sending Newsletters</p>	<p>If you decide to subscribe to the Newsletter, we will process the following personal data:</p> <ul style="list-style-type: none"> • Identification data (name or name and surname) • e-mail address, <p>Providing this data is necessary to subscribe to the Newsletter (contractual requirement).</p>	<ul style="list-style-type: none"> • Sending the Newsletter - article 6 (1) (a) GDPR – on the basis of Your voluntarily consent • archiving of documents, statistics and possible pursuit of claims or defense 	<p>For the duration of the Newsletter service or until Your consent is withdrawn.</p> <p>From the moment of withdrawal of consent - pseudonymised data will be stored for the</p>

			<p>against claims related to the performance of the Newsletter service - article 6 (1) (f) GDPR in order to implement the Controller's legitimate interest in archiving of documents, keeping statistics, pursuing claims or defending against claims.</p>	<p>period of limitation of claims of 3 years.</p> <p>The Controller periodically reviews the collected e-mail addresses, as a result of which unused e-mail addresses are deleted (i.e. addresses that have not been used for over 3 years).</p>
7.	<p>Maintaining the Controller's profile on Facebook and Instagram social networks and their service</p>	<p>If You follow the Controller's profiles on social networks (Facebook, Instagram, LinkedIn) or interact with the content we publish on social media, we naturally obtain access to Your Personal Data, which you make public in your own social profile, i.e. :</p> <ul style="list-style-type: none"> • name of the profile • data that You have placed on Your profile as public, <p>Providing this data is voluntary, but necessary for You to use our profiles on social networks.</p>	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in operating a social Network site 	<p>Until an effective objection is raised or the purpose of Data processing is achieved.</p>
8.	<p>Responding to complaints regarding the functioning of the Website</p>	<p>If You decide to submit a complaint related to the functioning of the Website or the services offered by the Controller, we will process your Personal Data contained in the complaint, in particular:</p> <ul style="list-style-type: none"> • Identification data (name or name and surname) • e-mail address, • contact details, • correspondence address (if a complaint is delivered by post) <p>Providing this data is necessary to consider the complaint.</p>	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in considering complaints and pursuing claims or defending against claims. 	<p>For the period necessary to consider the complaint, and after that time for the period of limitation of claims – e.g. 3 years or 6 years.</p>
9.	<p>Analysis of Your activity on the Website and possibility to adjust the functionality of the Website</p>	<p>If you use the Website, we process Anonymous Data in the following scope:</p> <ul style="list-style-type: none"> • dates and times of visits, • the IP number of the device You are using, • approximate location, • type of web browser, • time spent on the Website, 	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in the possibility of adapting the functionality of the Website to the interests of Users. 	<p>Until an effective objection is raised or the purpose of Data processing is achieved.</p>

		<ul style="list-style-type: none"> visited subpages and other activities undertaken by You on the Website 		
10.	Ensuring the proper functioning of the Website	<p>If you use the Website, we process Anonymous Data in the following scope:</p> <ul style="list-style-type: none"> the IP number of the device You are using, approximate location, data about the source from which Yo entered the Website 	<ul style="list-style-type: none"> Article 6 (1) (f) GDPR – for the Controller's legitimate interest in running and maintaining the Website 	Until an effective objection is raised or the purpose of Data processing is achieved.
11.	Recruitment of employees	<p>If You decide to take part in our recruitment for the position specified in the advertisement, we will process the following personal data:</p> <ul style="list-style-type: none"> identification data (name and surname), contact details (correspondence address, e-mail, telephone number), date of birth, seniority data, data on professional qualifications, the course of previous employment; other data provided by candidates in the application forms. 	<ul style="list-style-type: none"> Article 22 (1) of the Act of June 26, 1974 Labor Code and the Ordinance of the Minister of Family, Labor and Social Policy of December 10, 2018 on documentation employee, Article 22 (1) §1 point 4-6 of the Labor Code and Article 6 (1) (b) GDPR; Article 6 (1) (c) GDPR - in the case of data specified in art. 22 (1) §1 point 1-3 of the Labor Code in order to carry out the recruitment process; Article 6 (1) (a) GDPR - with regard to other data not specified by law; Article 9 (2) (a) GDPR - in the field of personal data of specific categories; Article 6 (1) (a) GDPR – on the basis of Your additional consent to participate in subsequent recruitments. 	<p>Until the recruitment procedure is completed or the consent to the processing of personal data is withdrawn.</p> <p>After completing the recruitment process, a maximum of 3 months from the moment of selecting the employee or or if You if you have consented to the processing of Personal Data in subsequent recruitments - a maximum of 1 year from obtaining Personal Data.</p> <p>With regard to persons with whom employment contracts will be concluded - for the duration of the contract, and after its termination, in accordance with applicable regulations.</p>

12.	Recruitment of associates	<p>If You decide to take part in our recruitment for the position specified in the advertisement, we will process the following personal data:</p> <ul style="list-style-type: none"> • identification data (name and surname), • contact details (correspondence address, e-mail, telephone number), • education data, • seniority data, • data on professional qualifications, • image - in the case of its inclusion in the CV (no obligation), • other data provided by candidates in the application forms. 	<ul style="list-style-type: none"> • Article 6 (1) (b) GDPR – in order to conclude a civil law contract in accordance with the provisions of the Act of 23 April 1964 Civil Code • Article 6 (1) (a) GDPR – on the basis of Your consent to participate in the recruitment and to include personal data in the application documents; • Article 6 (1) (a) GDPR – on the basis of Your additional consent to participate in subsequent recruitments. 	<p>Until the recruitment procedure is completed or the consent to the processing of personal data is withdrawn.</p> <p>After completing the recruitment process, a maximum of 3 (three) months from the moment of selecting the contractor or if You if you have consented to the processing of Personal Data in subsequent recruitments - a maximum of 1 year from obtaining Personal Data.</p> <p>With regard to persons with whom civil law contracts will be concluded - for the duration of the contract, as well as after its termination - during the mandatory period of storing financial and insurance documentation.</p>
13.	Recruitment of contractors	<p>If You decide to take part in our recruitment for the position specified in the advertisement, we will process the following personal data:</p> <ul style="list-style-type: none"> • identification data (name and surname), • contact details (correspondence address, e-mail, telephone number), • education data, • seniority data, • data on professional qualifications, • other data provided by candidates in the application forms. 	<ul style="list-style-type: none"> • Article 6 (1) (b) GDPR – in order to conclude a civil law contract in accordance with the provisions of the Act of 23 April 1964 Civil Code • Article 6 (1) (a) GDPR – on the basis of Your consent to participate in the recruitment and to include personal data in the application documents; • Article 6 (1) (a) GDPR – on the basis of Your 	<p>Until the recruitment procedure is completed or the consent to the processing of personal data is withdrawn.</p> <p>After completing the recruitment process, a maximum of 3 (three) months from the moment of selecting the contractor or if You if you have consented to the processing of Personal Data in subsequent recruitments - a maximum of 1 year</p>

			additional consent to participate in subsequent recruitments.	from obtaining Personal Data. With regard to persons with whom civil law contracts will be concluded - for the duration of the contract, as well as after its termination - during the mandatory period of storing financial and insurance documentation.
14.	Fulfillment of obligations related to the protection of personal data	<p>If you decide to exercise Your rights referred to in point IX of the Privacy Policy, we will process the following personal data:</p> <ul style="list-style-type: none"> • identification data (name and surname), • contact details (correspondence address, e-mail, telephone number). <p>Providing personal data is voluntary, but necessary for the Controller to properly perform the obligations arising from the provisions on the protection of personal data. Failure to provide data may result in the inability to properly exercise Your rights indicated in GDPR.</p>	<ul style="list-style-type: none"> • Article 6 (1) (c) GDPR – in order to compliance with a legal obligation to which the Controller is subject 	Until the expiry of the limitation periods for claims for violation of the provisions on the protection of personal data, in particular the GDPR and the Act on the Protection of Personal Data.
15.	Tax, accounting and other purposes resulting from Controller's legal obligations	<ul style="list-style-type: none"> • identification data, • correspondence address, • tax identification number 	<ul style="list-style-type: none"> • Article 6 (1) (c) GDPR – in order to compliance with a legal obligation to which the Controller is subject 	5 years from the end of the calendar year in which the tax payment deadline expired.
16.	Establishing, pursuing and enforcing claims or defending against claims.	<ul style="list-style-type: none"> • identification data, • e-mail address • correspondence address, • PESEL number • tax identification number 	<ul style="list-style-type: none"> • Article 6 (1) (f) GDPR – for the Controller's legitimate interest in establishing, pursuing and enforcing claims or defending against claims that may arise in connection with the economic activity conducted by the Controller. 	For the period of limitation of claims – e.g. 3 years or 6 years.

VII. CATEGORIES OF PERSONAL DATA RECIPIENTS

We share Your Personal Data with other entities only when it is necessary for the fulfillment of legitimate needs.

We do not intend to disclose Your Personal Data to other entities or third parties, except when:

- 1) You consent to the sharing of Your Personal Data;
- 2) it will be necessary for performance our services with provision that the disclosure of data always respects the principle of data minimisation and limitation of their processing;
- 3) Your Personal Data will be transferred to authorized entities providing us with services such as courier, logistic, legal, debt collection, consulting, auditing, marketing, hosting and IT services;
- 4) it will be necessary to ensure the security of the IT structure;
- 5) it will be necessary in order to fulfill the obligations arising from generally applicable law, in particular from tax regulations;
- 6) it will result from the request of an authorized public institution or judicial authorities.

The following external entities with whom we cooperate may be the recipients of Your Personal Data:

- 1) the provider of the Internet domain,
- 2) the provider of the Newsletter service (i.e. GetResponse S.A. with its registered office in Gdańsk (80-387), address: 6, A3 Arkońska Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court of Gdańsk North in Gdańsk, VII Commercial Division of the National Court Register under the KRS number 0000942075, NIP (tax identity number): 9581468984, REGON (statistical number): 192998251, with share capital amounting to PLN 5,559,840.00 fully paid.
- 3) the providers of services e.g. IT or accounting services – i.e.:
 - Just Join IT sp. z o.o. with its registered office in Gdańsk (80-386), address: 3B/1.44 Lęborska Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court of Gdańsk North in Gdańsk, VII Commercial Division of the National Court Register under the KRS number 0000774695, NIP (tax identity number): 5842781957, REGON (statistical number): 38708421, with share capital amounting to PLN 10,000.00;
 - No Fluff Jobs sp. z o.o. with its registered office in Gdynia (81-303), address: 5/40 Kielecka Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court of Gdańsk North in Gdańsk, VII Commercial Division of the National Court Register under the KRS number 0000700435, NIP (tax identity number): 5862324045, REGON (statistical number): 368568540, with share capital amounting to PLN 89,300.00;
 - Tax Book sp. z o.o. with its registered office in Warsaw (01-577), address: 4/5 Stanisława Wyspiańskiego Street, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Warsaw in Warsaw, XIV Commercial Division of the National Court Register under the KRS number 0000908764, NIP (tax identity number): 5252868338, REGON (statistical number): 389338097, with share capital amounting to PLN 5,000.00.
- 4) Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;
- 5) Mixpanel Inc. One Front Street Floor 28 San Francisco, CA 94111, US;
- 6) Hotjar Limited with its registered office in Malta at Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta, company number: 65490;
- 7) Segment Io Inc. 100 California St Suite 700 San Francisco, CA 94103, US.

- 8) Stripe Inc., 185 Berry St. 550, San Francisco, CA 94107, USA - the provider of payment services.

Your player profile created on the Service is available to search. By default, upon player's registration this profile is set up to 'private'. In this case only your nickname and date of registration is publically available.

A public profile makes i.e the following data public:

- nickname
- date of registration
- steam, faceit and esportal ranks
- number of matches played
- win rate - ratio of matches won to lost
- last 5 game results
- number of games played
- game statistics, such as roles distribution ratio, player statistics (offensive/defensive ratio, player performance level in certain skills), match statistics, side-by-side statistics).

In order to change the visibility of a profile, a user must agree to make it public by changing the appropriate field in the profile settings view. You can change your profile privacy preferences (private/public) at any time from your account settings.

VIII. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY

For the moment, We do not plan to transfer the Data to third countries (i.e. the countries outside the EEA (European Economic Area). Should it, however, happen, it will be executed in compliance with all requirements resulting from the binding provisions of law.

Due to the fact we use tools such as Google Analytics to collect Anonymous Data (which, in our opinion, do not have the characteristics of Personal Data) with significant caution we inform that Anonymous Data in the scope of abbreviated IP may be transferred to third countries, including the United States of America. You can obtain from the Controller a copy of the data transferred to a third country.

IX. DATA SUBJECTS' RIGHTS

In accordance with the provisions on the protection of personal data, in particular the GDPR, You have the following rights:

1. **to withdraw Your consent** to the processing of Personal Data at any time. Withdrawal of consent does not affect the lawfulness of the processing that has been made on the basis of your consent before its withdrawal, pursuant to Article 7 GDPR;
2. **to access Your Personal Data** and obtain from the Controller confirmation as to whether or not Your Personal Data are being processed, and, where that is the case, access to the Personal Data and i.a. the following information:
 - the purposes of the processing;
 - the categories of Personal Data concerned;

- the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;

pursuant to Article 15 GDPR;

3. **to rectify or supplement Your Personal Data** when it is incomplete or incorrect, pursuant to art. 16 GDPR;

4. **to erasure Your Personal Data (right to be forgotten)**, if:

- Your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw your consent and We have no other legal basis for processing this data;
- You raise an objection which We deem justified;
- Your Personal Data have been unlawfully processed,

pursuant to Article 17 GDPR;

5. **to restrict processing Your Personal Data**, if:

- You contest the accuracy of the Personal Data, for a period enabling the Controller to verify the accuracy of the Personal Data;
- the processing is unlawful and You oppose the erasure of the Personal Data and request the restriction of their use instead;
- We no longer needs the Personal Data for the purposes of the processing, but they are required by You for the establishment, exercise or defence of legal claims;
- You raise an objection, for a period until We verify the validity of the objection, pursuant to Article 18 GDPR;

6. **to data portability** and receive Your Personal Data, which You provided to the Controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the Controller to which the personal data have been provided, if we process Your Personal Data on the basis of consent in order to provide services or the processing is carried out by automated means, pursuant to Article 20 GDPR;

7. **to object**, on grounds relating to Your particular situation, at any time to processing of Your Personal Data which is based on our legitimate interests as the Controller. As a result of the objection, We will consider whether - due to Your special situation - the protection of Your interests, rights and freedoms outweighs the interests that we pursue using Personal Data, pursuant to Article 21 paragraph 1 GDPR;

8. **to submit a complaint to the supervisory body**, which is the President of the Personal Data Protection Office (address: 2 Stawki Street, 00-193 Warsaw), if you believe that Your Personal Data are being processed improperly

X. PROFILING AND NON-AUTOMATED DEICISON-MAKING

1. Profiling is the automated processing of Data that involves the use of personal data to evaluate certain personal factors about an individual, in particular to analyze or predict aspects of that individual's performance, economic situation, health, personal preferences, interests, reliability, behavior, location or movement.
2. In order to carry out the Service, in some cases we may use profiling. This means that through automated processing, we evaluate selected factors about individuals to analyze how they play.
3. On the basis of profiling, we do not use automated decision-making in individual cases at any stage of the processing of Data.
4. Profiling does not cause any legal consequences for You and does not significantly affect Your situation.
5. The scope of data subject to Profiling is analogous to the scope indicated for processing purposes regarding the analysis of activity on the Website.
6. The legal basis for the processing of Personal Data for the purpose of Profiling is Article 6 (1) (f) GDPR, according to which we can process Personal Data in order to achieve our legitimate goal of conducting marketing activities tailored to the preferences of Users.
7. We are entitled to process Personal Data for the purpose of Profiling until we achieve the purpose of data processing or You object effectively.

XI. GENERAL INFORMATION ABOUT COOKIES

Cookies are IT data, in particular text files, which are stored in the end device of website and application Users. Cookies usually contain the domain name of the website from which they originate, their storage time on the end device and a unique number. To know more about cookies and to manage them on our website please see [Cookies Policy](#).

XII. FINAL PROVISIONS

1. We are not responsible for any contents outside the Website, to which links may be found on the Website (e.g. in articles, posts or comments).
2. The Privacy Policy is an integral part of the Terms and Conditions, which define the rules, rights and obligations of Users and Professionals using the Website.
3. The User using the Website is bound by the current content of the Privacy Policy.
4. We reserve the right to make changes to the Privacy Policy if it will be required by law or modifications to the Website (such as functional development). Each time we will inform Users about any changes and the date of their entry into force via the Website in the "Privacy Policy" tab, and where appropriate, we will notify them by electronic means to the data subjects.

5. In matters not covered by the Privacy Policy, the generally applicable provisions on the protection of personal data, in particular the GDPR and the Act on the Protection of Personal Data.

Archival versions of the Privacy Policy:

Privacy Policy valid until 24.11.2022