

**PRIVACY POLICY**  
**FOR WWW.APSTRONAUTS.CO**

(LAST UPDATED: 31 March 2020)

The following Privacy Policy provides the rules of personal data processing and security, including Cookies, given to us by the Users in relation to their use of the Appstronauts website ([www.appstronauts.co](http://www.appstronauts.co)). The following privacy policy consists of information required by art. 13 of the GDPR.

**§1 GLOSSARY**

1. **We or Appstronauts** – Appstronauts spółka z ograniczoną odpowiedzialnością (limited liability company) seated in Warsaw, aleja Księcia Józefa Poniatowskiego 1, 03-901 Warsaw, Poland, registered in companies' register maintained by District Court for the capital city of Warsaw in Warsaw, XII Commercial Division of National Court Register under the KRS number: 0000579188, with NIP number: 7010510580, REGON 362674063, which is a controller of your personal data in relation to the usage of the Website;
2. **Newsletter** – information on the recent events and operations of the Appstronauts as well as marketing information about the services provided by Appstronauts, distributed – after providing consent – to the email address of the User, given to Us during the ordering of the Newsletter;
3. **Privacy Policy** – this privacy policy;
4. **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 performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
5. **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 (General Data Protection Regulation) (119, 4 May 2016, p. 1–88, as amended);
6. **Website** – internet service, provided through the website: [www.appstronauts.co](http://www.appstronauts.co), the purpose of which is to provide information about Us and to allow the contact with the company.

**§2 THE CONTROLLER**

1. Appstronauts spółka z ograniczoną odpowiedzialnością (limited liability company) seated in Warsaw, aleja Księcia Józefa Poniatowskiego 1, 03-901 Warsaw, Poland, registered in companies' register maintained by District Court for the capital city of Warsaw in Warsaw, XII Commercial Division of National Court Register under the KRS number: 0000579188,

with NIP number: 7010510580, REGON 362674063 is a controller of your personal data. You can contact Us through the following means:

- a) **email:** hello@appstronauts.co
- b) **phone:** +48 570 707 700
- c) **mail:** ul. aleja Księcia Józefa Poniatowskiego 1, 03-901 Warsaw, Poland

### **§3 THE PURPOSES AND THE LEGAL BASIS OF THE PROCESSING**

1. Within the service provided by Us, we process Your personal data only for the following purposes:
  - a) analytical and statistical;
  - b) establishment, exercise or defence of possible legal claims;
  - c) direct contact through email, phone or traditional mail in relation with our services;
  - d) distribution of the Newsletter
  - e) response to the inquires through the Project Estimation Form;
  - f) to provide Our services through the electronic means by allowing You to interact with Our content provided by the Website;
2. The legal grounds for the processing are :
  - a) In cases stated in section 1(a) – 1(d) above – the processing is necessary for the purposes deriving from Our legitimate interests (art. 6(1)(f) GDPR);
  - b) In case stated in section 1(a) above – your consent provided for use and storage of non-essential Cookies (art. 6(1)(a) GDPR);
  - c) In case stated in sections 1(e) and (f) - processing is necessary for the performance of a contract and to take steps at Your request prior to entering into a contract.
3. Providing Your personal data is in any case voluntary however, failure to provide the personal data marked as mandatory may result in inability to receive our Newsletter or response to Your inquiry, may also result in not adapting the Website to Your preferences or – in the case of necessary Cookies - may result in incorrect operation of the Website.
4. The legitimate interests pursued by Us are:
  - a) In case of analytical and statistical purposes – analysis of Your preferences and activities in order to assure better performance of Our Website, improvement of the quality of our services and to personalise Our offer and in consequence – to better meet Your needs;
  - b) In case of establishment, exercise or defence of possible legal claims – the defence of our rights;
  - c) In case of direct contact – the necessity to process Your personal data in regards to Your inquiry or other issues related to Our services;

- d) In case of the Newsletter – providing information on Our operations, changes on the Website, sending direct marketing content regarding our services.
5. Your personal data may be processed for the purposes related to our activities on social media. You'll find more information in §12 'Social Media'

#### **§4 THE RECIPIENTS OF YOUR PERSONAL DATA**

1. Within our services we often rely on services of external providers. For the efficient performance of our services, We transfer Your data to the following categories of recipients:
  - a) Hosting companies;
  - b) Email and mailing operators;
  - c) In case of legal requirements - government administration, local government administration, courts, law enforcement agencies.
2. Within Our services we transfer Your personal data to a countries outside of the European Economic Area (EEA) only when it's necessary and with respect to Your rights. In case of transfer to the United States of America, we cooperate only with companies participating in EU – USA Privacy Shield program, which according to the decision of the European Commission ensures an adequate level of protection.
3. Each time we ensure that every company participates in Privacy Shield programme or meets other criteria required by law. In order to verify whether particular company participates in the program, please visit the website: <https://www.privacyshield.gov/list>.

#### **§5 PERSONAL DATA RETENTION**

1. Your personal data isn't processed longer than it's necessary for the given purpose.
2. Your personal data is processed for the period of given service, for the period of expiration of potential claims and until Your consent is withdrawn or until You object the data processing on the grounds of Our legitimate interests.

#### **§6 YOUR RIGHTS**

1. Pursuant to the GDPR you have the following rights, which can exercised by contacting Us via the contact details provided in the Policy:
  - a) **Right of access to Your personal data**, i.e. right to obtain confirmation as to whether Your data is processed and in case when it is, the right to access Your data and information about Us and processing conducted by Us;
  - b) **Right of rectification of Your personal data**, according to which we ensure that You can exercise Your right to rectify inaccurate or incomplete data

- c) **Right of being forgotten, i.e. a right to erasure of Your data.** However, Your right to erasure is limited by the GDPR to specific cases. We can't delete Your data when We are not allowed to do so by law or We need your data to establish, exercise or defend possible claims. In cases where there are no grounds for erasure of Your data, You'll receive an information in which We'll indicate obstacles to deletion of Your data.
- d) **Right to restriction of processing,** which means that in cases where:
- You contest the accuracy of Your data,
  - You've found that the processing of Your data is unlawful but You don't request deletion,
  - We don't need Your data and You want to use them to establish, exercise or defend of legal claims,
  - You'll file an objection stipulated in §7 of the Policy,

You are entitled to obtain restriction of processing of Your data.

- e) **Right of data portability,** which means that You have the right to request Your personal data in readable format. We provide You the data in .xls format. Should You request data in any other readable format, please let us know. We'll try to provide You the data in the requested format. If it's possible, we can transfer your Data to other controller.

## **§7 RIGHT TO OBJECT**

In case of processing for the purpose of the performance of a task carried out in the public interest or in the exercise of official authority vested in Us, in the purposes arising from our legitimate interests or for the purpose of direct marketing, You are entitled to object to Our processing of Your data. If there are no legal obstacles, we will stop processing Your data.

## **§8 RIGHT TO WITHDRAW YOUR CONSENT**

You can withdraw Your consent for the processing of Your data at any given time. The withdrawal doesn't affect the processing that occurred before the withdrawal.

## **§9 RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

1. In relations to Our processing of Your data, You are entitled to lodge a complaint before the President of the Personal Data Protection Office. You will find more information on the website: in English - <https://uodo.gov.pl/en/559/941> or in Polish - <https://uodo.gov.pl/pl/p/skargi>.
2. In a case where the country of Your habitual residence, place of work or place of the alleged infringement is different than Poland, you have the right to lodge a complaint before supervisory authority competent for the given location.

## **§10 AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING**

1. Within the gathering of statistical and analytical data and within contextual or behavioural marketing automatic decision making occurs, including profiling.
2. The profiling occurs due to the gathering of Your data with the use of Cookies for the purpose of automated analysis of Your behaviour in the Internet and to prepare advertisement personalized for Your preferences.
3. The only consequence of the aforementioned profiling is increasing the quality of our services and advertisements customized to Your preferences.
4. Automated decision making, including profiling in aforementioned scope is conducted under our legitimate interest and under Your consent for the use of Cookies and other similar technologies.

## **§11 COOKIES AND OTHER SIMILAR TECHNOLOGIES**

1. We inform You that for the purpose of providing the best service possible We use Cookies and other similar technologies.
2. Cookies are small text files (or similar) stored on Your device (e.g. in Your PC, tablet or smartphone) which are used during the course of visiting the Website. Cookies usually consist of name of the given website, retention and unique number.
3. Cookies used by the Website don't change Your device's configuration files and installed software.
4. We as a Website operator are responsible for storing first party Cookies on Your devices and other companies – in a case of third party Cookies. Cookies are used for the following purposes:
  - a) Website customization and optimization to fit Your preferences;
  - b) To create statistics which help Us to understand how Users use websites which allows us to better customize our Website and optimize Our services;
  - c) To maintain the User's session;
  - d) Marketing – behavioural advertisements, contextual advertisements, remarketing;
  - e) Analysis of Users by gathering anonymised or pseudonymised statistical data regarding behaviour, localization, software and devices in order to know their preferences and to optimize the Website;
5. Cookies used for the purposes mentioned in section 5(a) to (c) above are Cookies necessary to provide a service over the Internet that you've requested or are used to aggregate anonymised statistical data.
6. Within our Website We use two kinds of Cookies:
  - a. session Cookies – temporary files which are stored in Your device up to time of logout, leaving the Website or closing the software (e.g. browser);

- b. persistent Cookies - files which are stored permanently up to the time provided in Cookie's configuration or up to the time of deletion. Within our Website We use the following Cookies:

<b>Cookie</b>	<b>Purpose</b>	<b>Session/Persistent</b>	<b>Third party</b>	<b>Retention</b>
<i>_ga</i>	Google Analytics use this Cookie to distinguish users.	Persistent	No	2 years
<i>_gid</i>	Google Analytics use this Cookie to distinguish users.	Persistent	No	24 hours
<i>_gat</i>	Google Analytics use this Cookie to throttle request rate.	Persistent	No	1 minute
<i>_hjTLDTest</i>		Session	No	For the period of the session

<i>_hjid</i>	This cookie is set when the customer first lands on a page with the Hotjar script. It is used to persist the random user ID, unique to that site on the browser. This ensures that behaviour in subsequent visits to the same site will be attributed to the same user ID.	Persistent	No	1 year
<i>_hjlIncludedInSample</i>	This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.	Session	No	For the period of the session
<i>PHPSESSID</i>	This strictly necessary cookie is a general purpose identifier used to maintain user session variables	Session	No	For the period of session
<i>fc_sb_1</i>	This cookie is necessary for filling and sending forms.	Persistent	No	10 years

7. Your consent for the use of Cookies can be withdrawn at any given time. The withdrawal doesn't affect the processing that took place before it. Internet browsers usually allow storing Cookies on Your device by default. Such settings can be changed to automatically block the use of Cookies or to inform about the storage of Cookies. However, blocking Cookies can affect the performance of the Website or prevent its operation.

8. To change the settings of Your browser You can use the following instructions::

- a) Google Chrome (or other based on Chromium): <https://support.google.com/chrome/answer/95647?hl=en&co=GENIE.Platform>
  - b) Mozilla Firefox: <https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>
  - c) Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
  - d) Edge: <https://support.microsoft.com/en-us/help/10607/microsoft-edge-view-delete-browser-history>
  - e) Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>
9. In case of Hotjar you can use the following instructions: <https://www.hotjar.com/legal/compliance/opt-out>.

## §12 SOCIAL MEDIA

1. On Our Website You can find links to Our social media profiles. Within our management of those profiles We are controllers or – depending on given service - joint controllers of Your data, thus We process data of visitors to Our profiles in social media (Facebook, Instagram, LinkedIn, Twitter). The data is processed by Us only for the following purposes:
  - a) Managing our profile (informing about Our promotions, offer, and activities of Appstronauts);
  - b) Gathering anonymized analytical and statistical data, aggregated by given social media service under the criteria defined by Us. The criteria are based on our clientele characteristics and our marketing goals;
  - c) Communication with Users via the tools provided by the particular social media service.
2. The legal basis for the personal data processing for the aforementioned purposes is Our legitimate interest involving creation and promotion of Our brand, analysis of You preferences and activity in order to ensure better business operation as well as increase the quality of Our services, to personalize offers and in consequence – to better meet Your needs.
3. In case of Facebook services, Facebook Ireland Ltd. (4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland) is a controller and – in some cases - joint controller of Your data. The appropriate terms and conditions and policy privacies are applicable. In order to read Facebook's privacy policy, please visit: <https://www.facebook.com/privacy/explanation>.
4. Our Website contains links to other social media platforms (Facebook, Twitter, Pinterest, Tumblr, LinkedIn, Reddit) which allow to share Our content, such as blog post. In case of Your use of sharing capabilities provided by these links, the particular social media platform is a controller of Your data; the appropriate privacy polices are applicable.



### **§13 THE PROJECT ESTIMATION FORM**

Within the Website You can use the Project Estimation Form. Through the form we collect such data as name and email address. Additionally we collect information provided by You on the project. In case of consent, You'll receive the Newsletter on the email address provided in the form.

### **§14 THE SECURITY OF THE PROCESSING**

1. The security of Your data is very important to Us. That's why We use appropriate technical and organisational measures adequate to risk of infringement of Your rights and freedoms and We ensure that the processing is conducted in accordance with the law.
2. In order to ensure the security of Your experience with the Website, we've implemented SSL encryption.

### **§15 AMENDMENTS TO THE POLICY**

Due to the regular review, We might update the Policy. We'll inform You about any change to the Policy via the Newsletter.

Should You have any doubts to any of the paragraphs of the Policy, We are at Your disposal. You can contact Us via contact details provided in this Policy.