

# **Privacy policy**

#### 1. Personal information processing

- 1. The following privacy policy applies to services provided by Meverywhere sp. z o.o. via mevspace.com
- Meverywhere sp. z o.o. is a commercial company with limited liability, with head office located at Miłobędzka Street 35, 02-634 Warszawa, Poland; subordinate to the law of the European Union and the Republic of Poland. The company is registered in national registry of companies by XIII Commercial Division of District Court for Warsaw under number KRS 0000346299 and is assigned tax identification number NIP 7282739782 and identification number REGON 100818967.
- 3. Meverywhere manages and process personal information of mevspace.com in order to maintain proper service provision.
- 4. Meverywhere sp. z o.o. takes activities required or recommended by law to protect the information against unauthorized processing and view.
- 5. Our client's personal data is processed for the purposes of:
  - a) providing services:
    - i. accounting and billing (according to Article 6 paragraph 1 letter f of the GDPR)
    - ii. debt collection
    - iii. managing contact with clients:
    - iv. quality of services and performance improvement
    - v. enabling the use of the admin panel and purchase of services (cookies for the session)
  - b) marketing and trading information (only with separate consent, according to Article 6 paragraph 1 letter a of the GDPR)
- 6. Personal information collected from our clients during registration to the system will be used only for provision of ordered services and managing the payments (Article 6 paragraph 1 letter b of the GDPR). For this purpose, we process following types of data:
  - a) First name and last name
  - b) e-mail address
  - c) registered address (name of the street, city, zip code, voivodeship, country)
  - d) tax identification number or personal identity number
  - e) bank account number.

() meverywhere		Strona
Polityka Prywatności	wersja 2.0	1 z 4
Tajemnica przedsjebiorstwa. Ujawnienie bez zgody Meverywhere Sp. z o. o. jest zabronione.		



- 7. We do not transfer to outside parties your personal information, except accounting data, processed in an automated way by third-party Fakturownia Sp. z o.o.
- 8. The accounting and billing data is kept for 60 months from the beginning of the year following the financial year in which transactions and proceedings were finally completed, paid off, squared or expired. The real time of keeping such data may be up to 10 years.
- 9. Personal information collected from our clients for the purpose of correspondence and technical support:
  - a) First name and last name
  - b) registered address (name of the street, city, zip code, voivodeship, country)
  - c) job position
  - d) e-mail address
  - e) phone number
  - f) IP address

Information collected during correspondence will be used only to provide the response. Contact details and correspondence is kept by the period of providing the services and additionally for 60 months after the agreement termination, in order to secure claims. After this period data and its copies are removed from all media.

- 10. Personal information collected from our clients for the marketing purpose:
  - a) First name and last name
  - b) registered address (name of the street, city, zip code, voivodeship, country)
  - c) job position
  - d) e-mail address.

These data related to currently provided services are used only to promote the new offer of Meverywhere Sp. z o.o. They are not processed automatically or transferred to third parties. Taking care of the privacy of our clients, we do not use automatic profiling or remarketing. We store them for the period during which consent is given.

- 11. Meverywhere may collect IP addresses from network traffic of provided services for maintenance, statistical or required by law purposes. Data collected for maintenance and law purposes is kept by the period of 12 months. However, data collected for statistical purposes is anonymised and kept for an indefinite period.
- 12. The data collected is processed only for the purposes necessary to provide the service.
- 13. Any collected data is kept in secret unless it is required to fulfill the law of the Republic of Poland or the European Union.
- 14. Meverywhere may refuse to stop processing personal information as long as the information is required for conducting trials of pending liabilities or law violations. In the

(1) meverywhere		Strona
Polityka Prywatności	wersja 2.0	2 z 4
Tajemnica przedsiębiorstwa. Ujawnienie bez zgody Meverywhere Sp. z o. o. jest zabronione.		



case information may be only processed in extend required for conducting trials of pending liabilities or law violations (Article 17 paragraph 3 letter e of the GDPR).

#### 2. Information update

- User has the right to drawback previously issued consent (Article 7 paragraph 3 of the GDPR), and also to inspect, to modify (rectify), to limit processing (Article 18 of the GDPR), to transfer data (Article 20 of the GDPR) and to demand to delete their data from all media by the data administrator, as well as all entities processing data for the benefit of the administrator - in this case - Meverywhere.
- 2. The privileges granted to the user from the rights referred to in Article 2 para. 1, via management panel when logged in (insight, modification, withdrawal of consent) or by direct request to Meverywhere sp. z o.o. via contact form available on mevspace.com/contact or by sending an e-mail on iod@meverywhere.pl.
- 3. Data acquired automatically may be the subject of update or erase, provided it does contain personal information.

### 3. Use of cookies

- 1. Mevspace.com may use cookie files for web browser identification occurring during service provision provided cookies are free of personal information.
- 2. Cookies are small files sent by a website and saved on the user's computer (usually on the hard drive), enabling Meverywhere to care for the quality of provided services and maintaining user's satisfaction. Cookies allow us to provide services via mevspace.com, thanks to which there is a possibility to choose the offer and use a shopping cart. We use cookies on the grounds of Article 6 paragraph 1 letters b and f of the GDPR.
- 3. According to Article 6 paragraph 1 letter f of the GDPR, we process data for statistical purposes and direct marketing. Data which Meverywhere Sp. z o.o. Is unable to identify are used in Google Analytics tool designed to traffic measurement. To avoid profiling through the Google Advertising Display Network, please follow the instructions at: <u>https://support.google.com/analytics/answer/181881</u>. For more information about the services provided by Google LLC, please visit this site: <u>https://policies.google.com/privacy/update.</u>
- 4. In analytical scripts such as Google Analytics, to ensure the highest level of data security Skynode uses anonymisation at an early stage.

() meverywhere		Strona
Polityka Prywatności	wersja 2.0	3 z 4
Tajemnica przedsiębiorstwa. Ujawnienie bez zgody Meverywhere Sp. z o. o. jest zabronione.		



- 5. Using Google Analytics or similar scripts, Mevspace anonymises data on early stage, which precludes tieing IP address with particular user.
- 6. In the user experience analysis scripts on the Mevspace website, i.e., SmartLook, full data anonymisation is used, none of the personal data is processed by us.

## 4. Security of processed personal information

- 1. Sensitive data processed by Meverywhere sp. z o.o. is stored on computers protected against unauthorized access according to High Security Level, original name 'wysoki poziom bezpieczeństwa', described in the act of the Ministry of Internal Affairs and Administration of the Republic of Poland, original name 'rozporządzenie ministra spraw wewnętrznych i administracji z dnia 29 kwietnia 2004r., w sprawie dokumentacji przetwarzania danych osobowych oraz warunków technicznych i organizacyjnych, jakim powinny odpowiadać urządzenia i systemy informatyczne służące do przetwarzania danych osobowych'.
- 2. In pursuance of Regulation 2016/679 of the European Parliament and of the Council (EU) of April 27th, 2016, all data collected by Meverywhere sp. z o.o. is processed according to specific and predefined purposes. Meverywhere grants an access to this data only to people responsible for processing personal information.

#### 5. Final statements

- 1. Meverywhere sp. z o.o. may update the privacy policy by publishing on the web page mevspace.com. The updated policy is applicable upon user agreement to the updated version.
- 2. In case of questions related to the protection of privacy user is encouraged to contact Meverywhere sp. z o.o. via contact form available on the contact page on mevspace.com web pages or by sending an e-mail to following address: iod@meverywhere.pl.

With the date of May 25th, 2018, all personal data breaches should be reported to PUODO (President of the Office for Personal Data Protection - Polish government institution responsible for personal information protection).

Valid since 25.05.2018

() meverywhere		Strona
Polityka Prywatności	wersja 2.0	4 z 4
Tajemnica przedsiębiorstwa. Ujawnienie bez zgody Meverywhere Sp. z o. o. jest zabronione.		