### WEBSITE PRIVACY POLICY

### 4CX

The application of the indicated Privacy Policy shall apply to all users using the website located at https://www.4cx.solutions/ (hereinafter referred to as: ,,Service''). The content of the websites of the Service is the property of the Administrator and is protected by law.

#### **CHAPTER I. Essential definitions**

**Administrator** - the administrator of the Website and the users' personal data is 4 cx limited liability company with its registered office in Wrocław (50-381) at 12/5 Marii Curii - Skłodowskiej Street, entered in the Register of Entrepreneurs kept by the District Court for Wrocław - Fabryczna in Wrocław, VI Economic Division of the National Court Register under KRS number: 0001036727, NIP 8982293395, share capital PLN 5,000, hereinafter referred to as: ,,4 cx" or "Administrator".

**Personal data** – information on 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 person;

**Policy** – the term means this Privacy Policy.

**Regulation** - 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.

**User** - any natural person visiting the Website or using one or more of the services or functionalities of the Website as described in the Policy.

### CHAPTER II. Protection of personal data

- 1. The Administrator processes Personal Data or other data when it is provided directly by the User through access registration or by using the Website, e.g. by means of the recruitment form or the contact form, and also when the User agrees to cookies' use. The Administrator therefore processes data including, but not limited to, name, surname, e-mail address, telephone number and IP address. Each time a separate form is filled in, the User will be informed by means of an information obligation clause about the scope of the necessary personal data and the purpose of their processing. When using the Website, all provisions relating to personal data processing have been included in Website's terms of use. In addition, the Administrator processes User Data in the scope of the IP address (cookies) and in the framework of providing the relevant functionalities on the Website.
- 2. Users' data is processed in order to enable the use of the functionalities of the Website in accordance with the Act of 18 July 2002 on the provision of services by electronic means (Journal of Law of 2020, item 344 as amended). The Administrator cares about their confidentiality; therefore, due to the necessity of ensuring appropriate organisation of the work and functioning of the Service, e.g. in terms of IT infrastructure or providing support for current issues concerning a conducted activity, as well as the realisation of the User's rights, the Personal Data may be transferred, among others, to the following categories of recipients such as service providers supplying the Administrator with technical and organisational solutions enabling the organisation's management. Personal data may be transferred outside the territory of the European Union, however, each time the Administrator ensures that this will

be done in compliance with the law and on the basis of an appropriate contract of entrustment containing standard contractual clauses.

3. Personal data of all persons using the Website (including IP address or other identifiers and information collected through cookies or other similar technologies), and those who are not registered Users (i.e. persons who do not have a profile on the Website), is processed by the Administrator:

a) in order to provide services electronically in the scope of providing Users with access to content collected on the Website, in which case the legal basis of the processing is the necessity of processing for the performance of the contract (Article 6(1)(b) of the Regulation);

b) for analytical and statistical purposes, in which case the legal basis of the processing is the Administrator's legitimate interest (Article 6(1)(f) of the Regulation), consisting of conducting analyses of the Users' activities, as well as of their preferences in order to improve the applied functionalities and provided services;

c) for the purposes of possible establishment and investigation of claims or defence against claims
the legal basis of processing is the legitimate interest of the Administrator (Article 6(1)(f) of the Regulation), involving protection of his rights;

- 4. The User's activity on the Website, including his/her Personal Data, is recorded in system logs (a special computer programme used to store a chronological record containing information on events and activities that concern the IT system used to provide services by the Administrator). The information collected in the logs is processed primarily for purposes related to the provision of services. The Administrator also processes them for technical, administrative purposes, for the purposes of ensuring the security of the IT system and the management of this system, as well as for analytical and statistical purposes in this respect, the legal basis of the processing is the Administrator's legitimate interest (Article 6(1)(f) of the Regulation).
- 5. Data provision and the use of the Website is completely free of charge and voluntary. In the case of additional services, the User will be informed of the need to pay a fee.
- 6. The period of data processing by the Administrator depends on the type of service provided and the purpose of the processing. As a rule, the Data shall be processed for the duration of service provision or the execution of the order, until the withdrawal of the consent given or until an effective objection is raised against the Data processing in cases where the legal basis of the Data processing is the legitimate interest of the Administrator. This period may be extended if the Administrator needs the Data for the purposes of defending or enforcing claims.
- 7. The Administrator provides the User with the right to access, rectify, request erasure or restriction of Data processing as well as to object to data processing and the right to data transfer to another data Administrator. The Administrator also informs about the User's right to file a complaint to a data protection supervisory authority.

## CHAPTER III. Terms of use

- 1. The Administrator indicates that in order to use the Website, the User should have a device with installed software allowing for web browsing and access to the Internet. The Website can be accessed using the most popular web browsers.
- 2. The contents of the websites of the Service are the property of the Administrator and are protected by law. The Administrator declares that the websites of the Service are free from content that violates the third parties' rights or the applicable law, and in particular from content that contains information that

causes or threatens privacy or security of any person, information that promotes illegal activities or behaviour, that is abusive, threatening, obscene, defamatory or libellous, racist, ethnically, culturally or religiously aggravating, promotes or encourages criminal activities, infringes the rights of third parties, including intellectual property rights, or otherwise constitutes an infringement of legally protected rights. The Website may contain links to third party websites. Third party websites have their own privacy policies.

## **CHAPTER IV. Cookie mechanism**

 The Administrator does not use cookies to collect information constituting Service User's Personal Data. Cookies are used on a device and then used for statistical purposes, to improve the functionality of the website and other functions. Each time the User may block or simply restrict the operation of the cookies' mechanism on the Website. This should be done by changing the browser settings or via a cookie banner. In order to display the content of Website it is necessary to accept all cookies within the first category.

Name	Туре	Description	Storage period
bsesja	Essential	Essential for measuring and reporting website performance.	Session
debug	Essential	This cookie is used to detect errors on website - this information is sent to staff website support to optimise visitor's experience on the website.	Session
firebase-heartbeat- database#firebaseheartbeat- store	Essential	It is used to detect spam and improve service security.	Session
Hs	Essential	Ensures safe browsing by visitors, preventing counterfeiting requests between websites. This cookie is essential for the security of the website and the visitor.	Session
rc::a	Essential	This cookie is used to distinguish between humans and bots. It is beneficial for the website to report correctly on the use of its website.	Session

2. The website uses the following types of cookies:

		This so alite is used to	Casalar
rc::c		This cookie is used to	Session
	Essential	distinguish between	
		humans and bots.	
		This cookie is essential	1 day
		for the operation of the	
ssr-caching	Essential	cache. The cache is used	
		by the website to	
		optimise the	
		response time between	
		the visitor and the	
		website. The cache is	
		usually stored in the	
		visitor's browser.	
		This cookie is required	400 days
svSession		for the	400 uays
	Essential	logging function on to	
		the website.	
		Ensures safe browsing	Session
		by visitors, preventing	36331011
		counterfeiting requests	
	Essential	between websites. This	
XSRF-TOKEN		cookie is necessary for	
		the security of the	
		website and the visitor.	
		website and the visitor.	
		Facilitates the	Session
	Essential	notification function in	
firebaseLocalStorage		the chat window,	
Db#firebaseLocalStor age		enabling the support	
		team to notify websites'	
		user to reply in the chat	
		window.	
wixAB3,		This cookie is used by	180 days
		the website operator in	
	Statistical	the context of	
		multidimensional	
		testing.	
		It is a tool for linking or	
		changing content on a website. This enables	
		the website to find	
		the best	
		variation/edition of the	
		website.	

_wixAB3 #-#-#-#-#- #	Statistical	This cookie is used by the website operator in the context of multidimensional testing. It is a tool for linking or changing content on a website. This enables the website to find the best variation/edition of the website.	1 day
fedops.logger.session Id	Statistical	It records statistical data on users' behaviour on the website. Used for internal analysis by the website operator.	Session

- The User has the right to decide on the access of cookies to the device used by selecting them in advance in his/her browser window or indicating them via the cookie banner. How to manage cookies

   instructions included within the web browsers used:
   instructions included within the web browsers used:
  - Mozilla Firefox: http://support.mozilla.org/pl/kb/ciasteczka
  - Internet Explorer: https://support.microsoft.com/pl-pl/windows/usuwanie-plik%C3%B3w-cookieizarz%C4%85dzanie-nimi-168dab11-0753-043d-7c16-ede5947fc64d
  - Google Chrome: https://support.google.com/accounts/answer/61416?hl=pl&co=GENIE.Platform%3DD\_esktop
  - Safari: http://safari.helpmax.net/pl/
  - Opera: http://help.opera.com/Linux/9.22/pl/cookies.html
- 4. The Data Administrator reserves the right to use third parties to compile statistics on the use of the Website. We assure you that in such a case no data identifying users will be transferred to such entities. Third-party cookies may be used in advertisements on the Website in order to analyse the effectiveness of an advertising campaign. This Privacy Policy does not regulate the use of cookies by third parties.

# **CHAPTER VI. Marketing activities**

The Administrator processes the Users' Personal Data in order to carry out marketing activities, which may consist in:

- displaying marketing content that is not tailored to your preferences (contextual advertising);
- displaying marketing content relevant to the User's interests (behavioural advertising);
- to send e-mail notifications of interesting offers or content, which in some cases contain commercial information (if additional marketing consents have been given);
- carrying out other activities related to direct marketing of goods and services.

## **CHAPTER VII. General rules**

- 1. The Privacy Policy does not cover information in relation to services provided by entities other than the Data Administrator's which are posted on the Website commercially, featuring, on a reciprocal basis or for no commercial purpose.
- 2. The Data Administrator shall not be liable for the actions or omissions of users, as a result of which the Data Administrator processes the personal data provided by them in a manner not specified in the Privacy Policy document.
- 3. The Administrator reserves the right to make changes, withdraw or modify the functions or features of the Website, as well as to discontinue operations, transfer rights to the Website and perform any legal actions permitted by applicable law. However, any actions carried out by the Data Administrator must not infringe the User's rights.

## **CHAPTER VIII. Changes**

- 1. The Data Administrator reserves the right to amend the Policy if required by law or changes to the functionalities of the Website. The Administrator shall notify all its users of the relevant changes and their effective date, in particular by posting a notice on the Website.
- 2. The date set out below is the effective date of the Privacy Policy in its latest version.

## Current version of the Privacy Policy dated: 22.03.2024