

Competence.zone Privacy Policy and Cookie Policy

We commit to strong and transparent privacy practices. Our Privacy Policy explains:

- What Personal Data we collect and why we collect it
- How we use Personal Data
- Who we share Personal Data with
- The choices we offer, including how to access, update, and remove Personal Data

We have kept this simple for your understanding, but if you're not familiar with terms like "cookies" or "IP addresses," feel free to contact us.

INTRODUCTION

This Privacy Policy ("Privacy Policy") sets forth the privacy practices of competence.zone. This Privacy Policy describes how competence.zone collects, discloses, stores, transfers, and uses information that could individually identify our users ("Personal Data") in connection with our Service.

This Privacy Policy does not apply to the practices of third parties, as explained in more detail below. In this Privacy Policy, "we," "us," "our," and other similar references mean competence.zone, "you" and "your" and other similar references mean any user of the Service.

- Please contact us if you have any questions or comments about our privacy practices.

TRANSFERS OF PERSONAL DATA

The Service is hosted and operated in Poland. By using the Service, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to competence.zone and will be hosted on Polish servers, and you authorize competence.zone to transfer, store, host and process your information to and in Poland, and possibly other countries.

PERSONAL DATA

If you are located in the EU, you may have additional rights under the EU General Data Protection Regulation (the "GDPR") related to your Personal Data, as further described below. Competence.zone will be the controller of your Personal Data processed in connection with the Service.

NOTICE OF WHAT INFORMATION WE COLLECT AND HOW WE USE IT

Types of Personal Data We Collect

Competence.zone collects Personal Data about you when you provide it directly to us, or when Personal Data about you is automatically collected in connection with your use of our Service. We collect the following Personal Data from you in connection with the Service:

- a. **Contact Information:** information we collect to identify or contact you, we collect typical “business card information” such as your first and last name, physical address, email address, telephone number
- b. **User Content:** to the extent that you choose to input Personal Data as part of such content, i.e. comments that you post to or through the Service.
- c. **Log Data:** information automatically recorded by the Service about how a person uses our Service, such as IP addresses, device and browser type, operating system, the pages or features of our Website or Service to which a user browsed, the time spent on those pages or features, the frequency with which the Service is used by a user, search terms used by a user, the links on the Service that a user clicked on or used, and other statistics.

We also collect usage and performance information that is not Personal Data or that we aggregate or de-identify so that it no longer personally identifies an individual. We also associate some data that is not Personal Data with Personal Data.

We collect Personal Data when a user communicates with us; and responds to a communication or interaction from us. Some of the methods and tools we use to collect Personal Data are:

- a. **Unique Identifiers:** We use unique identifiers such as cookies, e-mail or your pseudonymized customer ID to track individual usage behavior on our Service, such as the length of time spent on a particular page and the pages viewed during a particular log-in period. Unique identifiers collect information about a user’s use of our Service on an individual basis.
- b. **Mobile Device Identifiers:** Mobile device identifiers are identifiers stored on your mobile device that track certain data and activities occurring on or through your device. Mobile device identifiers enable collection of Personal Data (such as media access controls) as well as non-personally identifiable information (such as usage and traffic data).
- c. **Cookies, and Other Tracking Tools:** We collect information about you, your device, and your use of the Service through cookies, and other tracking tools and technological methods (collectively, “Tracking Tools”). Tracking Tools collect information such as computer or device operating system type, IP address, browser type, browser language, mobile device ID, device

hardware type, the website or application visited or used before or after accessing our Service, the parts of the Service accessed, the length of time spent on a page or using a feature, and access times for a webpage or feature. These Tracking Tools help us learn more about our users and analyze how users use the Service, such as how often users visit our Service, what features they use, what pages they visit, what emails they open, and what other sites or applications they used prior to and after visiting the Service.

Cookies: Like many websites and mobile application operators, we collect certain information through the use of “cookies,” which are small text files that are saved by your browser when you access our Service. Cookies can either be “session cookies” or “persistent cookies”. Session cookies are temporary cookies that are stored on your device while you are visiting our Website or using our Service, whereas “persistent cookies” are stored on your device for a period of time after you leave our Website or Service. We use persistent cookies to store your preferences so that they are available for the next visit, and to keep a more accurate account of how often you visit our Service, and how your use of the Service varies over time. We also use persistent cookies to measure the effectiveness of advertising efforts. Through these cookies, we may collect information about your online activity after you leave our Service. For more information on cookies, including how to control your cookie settings and preferences, visit:

http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm, <https://ico.org.uk/for-the-public/online/cookies/> and <http://www.allaboutcookies.org/>

Third Party Sources

We may use third-party services, such as open search tools and social networks, to obtain information about you (such as your name or company) and to enrich your personal information by obtaining publicly available information about you, such as your job title, employment history and contact information.

Use of Personal Data

Competence.zone uses Personal Data to:

- a. provide, administer, and improve our Service;
- b. better understand your needs and interests;
- c. fulfill requests you make;
- d. personalize your experience;
- e. provide Service announcements;
- f. provide you with information and offers;
- g. protect, investigate, and deter against fraudulent, harmful, unauthorized, or illegal activity;
- h. comply with legal obligations.

For example, we use Personal Data to:

→ Operate and improve the Service

- Learn more about our users and their internet behaviors
- Target offers to users
- Facilitate communications among and between users and the public in general
- Evaluate eligibility of customers for certain offers, products, or services
- Evaluate the types of offers, products, or services that may be of interest to users
- Provide user support
- Communicate with users regarding support, security, technical issues, commerce, marketing, and transactions
- Facilitate marketing, advertising, surveys, contests, sweepstakes, and promotions
- Enforce our contracts, administering and carrying out our obligations under contracts, and complying with the law
- Publish aggregated data about usage trends, which may be derived from Personal Data

PROCESSING GROUNDS

We will only use your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity, and our “legitimate interests” or the legitimate interest of others, as further described below.

i. Contractual Necessity:

We process the following categories of Personal Data because we need to process the data to perform under our User Agreement with you, which enables us to provide you with the Service. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Service that require such data:

- Contact Information
- User Content

ii. Legitimate Interest:

We process the following categories of Personal Data when we believe doing so furthers the legitimate interest of us or third parties:

- Contact Information
- User Content

Examples of these legitimate interests include:

- Operation and improvement of our business, products, and services
- Marketing of our products and services
- Protection from fraud or security threats
- Compliance with legal obligations

→ Completion of corporate transactions

iii. Consent:

In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

iv. Other Processing Grounds:

From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

HOW AND WITH WHOM DO WE SHARE PERSONAL DATA?

We share Personal Data with vendors, third party service providers, and agents who work on our behalf and provide us with services related to the Service. These parties include third parties, who act for us or provide services for us, such as hosting, and database management services. We also share Personal Data when we believe it is necessary to:

- a. Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies;
- b. Protect us, our business or our users, or third parties, for example to enforce our terms of service, prevent spam or other unwanted communications and investigate or protect against fraud;
- c. Maintain the security of our products and services.

We also share information with third parties when you have given us consent to do so.

YOUR PRIVACY CHOICES

Opting Out of Behavioral Advertising and Tracking Tools

You can opt-out of certain Behavioral Advertising activities by doing one or more of the following. Please note that you will need to opt-out of each browser and device for which you desire to apply these opt-out features.

i. Service Provider Opt Out:

You can opt-out directly from some Advertising Service Providers and providers of Tracking Tools by using their opt-out tools. Some of these service providers, and links to their opt-out tools, are Google Analytics: with a privacy policy at http://www.google.com/policies/privacy/partners/and_opt_out at <https://tools.google.com/dlpage/gaoptout>.

ii. Industry Opt Out Tools:

Some Advertising Service Providers or providers of Tracking Tools may participate in the Network Advertising Initiative's (NAI) Opt-Out Tool (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (DAA) Consumer Choice Page (<http://www.aboutads.info/choices/>), and you can opt-out of certain services and learn more about your choices by visiting the links included there. Users in the EU can visit <http://www.youronlinechoices.eu/> for more information about your choices and to opt out of participating service providers.

iii. Web Browser Controls:

You can prevent the use of certain Tracking Tools, such as cookies, on a device-by-device basis using the controls in your web browser. These controls can be found in the Tools → Internet Options (or similar) menu for your browser, or as otherwise directed by your browser's support feature. Through your web browser, you may be able to:

- Delete existing Tracking Tools;
- Disable future Tracking Tools;
- Set your browser to provide you with a warning each time a cookie or certain other Tracking Tools are being set.

iv. Mobile Opt Out:

Your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for Behavioral Advertising. You may also opt-out of certain Tracking Tools on mobile devices by installing the DAA's AppChoice app on your mobile device:

- for iTunes, visit <https://itunes.apple.com/us/app/appchoices/id894822870?mt=8>,
- for Android: <https://play.google.com/store/apps/details?id=com.DAA.appchoices&hl=en>.

For more information, please visit:

<http://support.apple.com/kb/HT4228>, <https://support.google.com/ads/answer/2662922?hl=en> or <http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device>, as applicable.

v. Do Not Track:

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. The Service does not support Do Not Track requests at this time, which means that we

collect information about your online activity both while you are using the Service and after you leave our Service.

vi. Our Cookie Management Tool:

We also allow you the ability to opt out of certain types of Cookies by clicking on the cookie banner when you first enter the applicable website (for EU users), or by using the solution below:

Please note the following with respect to opting out of Behavioral Advertising:

Some opt-out features are cookie-based, meaning that when you use these opt-out features, an “opt-out” cookie will be placed on your computer or other device indicating that you do not want to receive Behavioral Advertising from certain companies. If you delete your cookies, use a different browser, or use a different device, you will need to renew your opt-out choice.

Opting-out of Behavioral Advertising does not mean that you will no longer receive online ads. It only means that such ads will no longer be tailored to your specific viewing habits or interests. You may continue to see ads on and about the Service.

vii. Emails:

We will give you the ability to opt-out of marketing-related emails by clicking on a link at the bottom of each such email. You cannot opt-out of receiving certain non-marketing emails regarding the Service.

viii. Information Shared with Third Parties:

When we share Personal Data with third parties in ways not set forth in this privacy policy, you will be notified and will be able to prevent the sharing of this information. For example, this could occur if you register to use or purchase a third party application through our Service. However, please note that opting-out of information sharing or collection may affect your ability to use applicable third-party features as well as some features of the Service.

SECURITY

We believe the security of your information is a serious issue and we are committed to protecting the information we receive from you. We use commercially reasonable security measures to protect against the loss, misuse, and alteration of your information under our control based on the type of Personal Data and applicable processing activity, such as data encryption in transit, pseudonymization, and enforcement of least privilege and need-to-know principles.

DATA RETENTION

We retain Personal Data about you for as long as you make a business conversations with us. Thereafter 30 days after we will close the business conversations with negative result, or sooner upon request (except as required by law)). In some cases we retain Personal Data for longer, if doing

so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. Upon disposal, we will destroy or render unreadable any such Personal Data. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

INTERACTIONS WITH OTHERS

This Privacy Policy applies only to the Service. It does not apply to products, services, or sites that are provided by or operated by third parties, even if such products, services or sites are linked or redirected to or from the Service ("Third-Party Sites"), regardless of whether or not such link or redirection is authorized by Competence.zone. Third-Party Sites may have their own policies regarding privacy, or no policy at all. The fact that we link to a Third-Party Site is not an endorsement, authorization, or representation that we are affiliated with that third party. We are not responsible for Third-Party Sites, and you use them at your own risk. We encourage you to read the privacy policies and terms of the Third-Party Sites that you visit or use.

WHAT RIGHTS AND CHOICES DO YOU HAVE REGARDING YOUR PERSONAL DATA?

Accessing, Correcting, and Deleting Your Personal Data and Other Data Subject Rights

You have certain rights with respect to your Personal Data, and we want to help you review and update your information to ensure it is accurate and up-to-date. We may limit or reject your request in certain cases, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, if it is not required by law, or if the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question. In some cases, we may also need you to provide us with additional information, which may include Personal Data, to verify your identity and the nature of your request. We will take reasonable steps to respond to all requests within 30 days (or less!). You can contact us directly at contact@competence.zone if you have any additional requests or questions:

- a. **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- b. **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- c. **Erasure:** You can request that we erase some or all of your Personal Data from our systems. Please note that if you request the deletion of information required to provide the Service to you, your User Account will be deactivated and you will lose access to the Service.
- d. **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

→ For the following, please email us at contact@competence.zone

Withdrawal of Consent: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Service.

Objection: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for marketing purposes.

Restriction of Processing: You can ask us to restrict further processing of your Personal Data. You also have the right to lodge a complaint about our practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

ENFORCEMENT AND RECOURSE

We take our privacy commitments very seriously. We will conduct internal audits of our compliance with this Privacy Policy, and work to ensure that our employees and service providers also adhere to the Privacy Policy. If you have any questions or concerns regarding privacy related to the Service, please send us a detailed message to contact@competence.zone, and we will try to resolve your concerns.

CHANGES TO THE PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, you will be notified via email (if you have an account where we have your contact information) or otherwise in some manner through the Service that we deem reasonably likely to reach you (which may include posting a new privacy policy on our Website—or a specific announcement on this page or on our blog). Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting) or on the Effective Date set forth in the modified Privacy Policy. In all cases, your continued use of the Service or Website after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

WHAT IF YOU HAVE QUESTIONS REGARDING YOUR PERSONAL DATA?

Please contact us if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us online at contact@competence.zone, or by mail at: Competence, Feliksa Nowowiejskiego 3/6, 61-731 Poznan, Poland.