

Privacy Policy of MATCHUP sp.z o.o.

Ladies and Gentlemen!

This Privacy Policy contains information on the rules governing the processing of personal data by MATCHUP sp. Z o.o. with headquarters in Warsaw, as part of entering MATCHUP sp.z o.o. in any relationship in connection with which your personal data will be processed. Goal

the functioning of this document is the fulfilment of the information obligation, in accordance with art. 13 and 14

GDPR, as broadly and precisely as possible, hence it describes all categories

people whose data is processed by the Company, including people using the functionality

MatchUp application, both mobile and web. The rules for using the MatchUp Application are set out in

separate Regulations (<https://matchup.pl/wp-content/uploads/2022/06/terms-and-conditions.pdf>).

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§ 1

Administrator

1. The administrator of personal data is MATCHUP sp.z o.o. with headquarters in Warsaw, ul. Cybernetyki 19B, 02-677 Warsaw, registered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw, XIII Commercial Division of the National Register Court under KRS number: 0000818275, NIP number: 5213886728 and number REGON: 385265906 (hereinafter: "MATCHUP", "administrator" or "we").
2. In certain cases, we may also process data as a recipient or entity processors.

§ 2

Contact details

We have designated a contact point to provide you with detailed information. You can contact us by e-mail by writing to the following address: kontakt@matchup.pl, or by writing to the address of the registered office administrator.

§ 3

Data processing - categories of people whose data is processed

1. MatchUp application users (people who have registered in the MatchUp application - mobile or web)

If you are one of the users of the MatchUp application, then:

- a. We process your data in order to conclude or perform a contract between us and you - i.e. account registration and use of the functionality of the MatchUp application, processed on this basis there are in particular the data necessary to register the account: e-mail and password, as well as data about the dimensions body - necessary to use the main functionality of the application (Article 6 (1) (b) of the GDPR), other personal data that are not necessary for the proper functioning of the application, such as: image

recorded in the profile photo, age, etc. are processed on the basis of the expression expressed by you consent, which takes place through your explicit action - voluntary input of this data to the application (Article 6 (1) (a) of the GDPR). In certain cases, we may process data up to achieving goals resulting from legitimate interests (Article 6 (1) (f) of the GDPR) - in particular for statistical and analytical purposes; our other legitimate cases interests are described in §4;

b. Recipients of data may be entities that provide us with legal and IT services, hosting, marketing, consulting and our other trusted partners with whom we have concluded agreements

entrusting the processing of personal data. If your employer buys access to Corporate Module, it is after you have entered the application received from him a unique identifier, the data from your profile required by your employer will be made available to him, so that he can choose clothes with the right dimensions; if they do A country of online purchase of clothes from a store with which we have an agreement (e-commerce), this is

Your data as part of the purchase will be made available to the indicated store, w in relation to these data will be a separate administrator.

c. Your data will be stored for the duration of the contract - i.e. for the duration of the account in MatchUp application), after deleting the account, the data will be anonymized no later than 7 days after deletion of the account by the user and will be processed for statistical purposes. Law may provide for a longer period of data storage, in particular in terms of pursuing or defending claims, which may even keep some of your data after the end of the contract that binds us; cases of a longer processing period we describe the data in § 4;

d. In connection with the processing, you have the right to access and access your data rectification, the right to delete, the right to limit processing, the right to bring object to processing, the right to lodge a complaint to the President of the Data Protection Office Osobowych (ul. Stawki 2, 00-193 Warsaw); in the scope of data processed on the basis of Your consent has the right to withdraw your consent, which does not affect compliance with the law processing of these data before its withdrawal. Detailed information about individual rights can be found in §5;

e. Your personal data may be processed in the form of analytical profiling, but binding decisions will not be automated, that is, they will never be taken without participation human

f. Providing data is voluntary, but refusal to provide some data may make it impossible conclusion or performance of a contract (i.e. creating an account or using a functionality Application).

2. Entities purchasing access to the MatchUp Corporate Application Module

a. We process your data in order to conclude or perform a contract - access to the module corporate in the Application (Article 6 (1) (b) of the GDPR) and for the purposes resulting from from legitimate interests (Article 6 (1) (f) of the GDPR) - in particular processing contact persons details; other cases of our legitimate interests we describe in §4;

b. Recipients of data may be entities that provide us with legal and IT services, hosting, marketing, consulting and our other trusted partners with whom we have concluded agreements entrusting the processing of personal data;

c. Your data will be stored for the duration of the contract and min. 5 years from the end of the year calendar on which the tax payment deadline in connection with the concluded contract has expired, however legal provisions may provide for a longer period of data storage, in particular in the scope of the investigation or defence of claims; cases of a longer period of data processing we describe in § 4;

d. In connection with the processing, you have the right to access and access your data rectification, the right to delete, the right to limit processing, the right to bring object to processing, the right to lodge a complaint to the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw); detailed information on the individual rights can be found in §5;

e. Providing data is a contractual requirement, and refusal to provide it may make it impossible to conclude it or performance of a contract;

f. Your personal data will not be processed in the form of analytical profiling.

3. Employees and persons employed under a civil contract or otherwise in MATCHUP sp. Z

o.o.

If you belong to the group of our employees or persons employed under a contract civil or in any other form:

a. We process your data on the basis and to the extent specified in art. 221 of the Labour Code (art. 6

paragraph 1 lit. b GDPR), or to implement a civil law contract (Article 6 (1) (b) of the GDPR), in order to

comply with the legal provisions incumbent on the Administrator (Article 6 (1) (c) of the GDPR), and in

in certain cases to achieve goals resulting from legitimate interests (art.

6 sec. 1 lit. f GDPR); we describe cases of our legitimate interests in §4;

b. Recipients of data may be entities that provide us with legal and IT services,

hosting, marketing, consulting and our other trusted partners with whom we have concluded agreements

entrusting the processing of personal data;

c. Your data will be stored for the duration of the contract and min. 5 years from the end of the year calendar on which the tax payment deadline in connection with the concluded contract has expired, however

legal provisions may provide for a longer period of data storage, in particular

in the scope of the investigation or defence of claims; cases of a longer period of data processing we describe in § 4;

d. In connection with the processing, you have the right to access and access your data

rectification, the right to limit processing, the right to object to

processing, the right to lodge a complaint to the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw); you will find detailed information on each of the rights

State in §5;

e. Providing data is a contractual requirement, and refusal to provide it may make it impossible to conclude it

or the performance of the contract.

f. Your personal data will not be processed in the form of analytical profiling

4. Suppliers, Contractors, Partners

If you supply us with goods or services, either you are our partners, or contractors are:

a. We process your data in order to conclude or perform a contract (Article 6 (1) (b) of the GDPR) and for the purposes of legitimate interests (Article 6 (1) (f) of the GDPR),

in particular, the processing of data of contact persons; other cases of ours

we describe legitimate interests in § 4;

b. The categories of personal data processed may include: name and surname, telephone number, address

e-mail, company name, NIP, REGON, function / position;

c. Recipients of data may be entities that provide us with legal and IT services, hosting, marketing, courier, consulting and our other trusted partners with whom we have concluded contracts for entrusting the processing of personal data;

d. The data will be stored for a period of at least 5 years from the end of the calendar year in which it expired

the deadline for paying the tax in connection with the concluded contract, however, the law may provide

longer data storage period, in particular in the field of investigation or defence

claims; cases of a longer period of data processing are described in § 4;

e. In connection with the processing, you have the right to access and access your data

rectification, the right to limit processing, the right to object to

processing, the right to lodge a complaint to the President of the Personal Data Protection Office (ul.

Stawki 2, 00-193 Warsaw); you will find detailed information on each of the rights

State in § 5;

f. your personal data will not be processed in the form of analytical profiling;

g. Providing data is a contractual requirement, and refusal to provide it may make it impossible to conclude or

contract performance;

5. Representatives and contact persons

If you are the representative or contact person:

a. we process your data to achieve the purpose resulting from legitimate interests, which is communication between us and you (Article 6 (1) (f) of the GDPR); other cases we describe our legitimate interests in § 4;

b. The categories of personal data processed may include: name and surname, company with which they are

Associated country, your position / function, business telephone number, work number

e-mail address, history of contacts between us and you;

c. Recipients of data may be entities that provide us with legal and IT services, hosting, marketing, courier, consulting and our other trusted partners with whom we have concluded contracts for entrusting the processing of personal data;

- d. The data will be stored for the period necessary to meet the related needs maintaining contact between us and you;
- e. In connection with the processing, you have the right to access and access your data rectification, the right to limit processing, the right to object to processing, the right to lodge a complaint to the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw); you will find detailed information on each of the rights State in § 5;
- f. Providing data is voluntary, and refusal to provide it may prevent communication.

g. your personal data will not be processed in the form of analytical profiling;

6. People visiting or using the services of our website (this section does not apply to the app website, the basis for processing of which are specified in point 1)

If you contact us through our website or otherwise use it:

a. we process your data to achieve the purpose resulting from legitimate interests, which is communication between us and you (Article 6 (1) (f) of the GDPR); creating statements, analyses and statistics based on legitimate interest in improvement our offer and services and adapting them to your preferences (Article 6 (1) (f) of the GDPR); other cases of our legitimate interests are described in §4;

b. Recipients of data may be entities providing IT and hosting services and marketing and other entities with whom we have concluded processing entrustment agreements personal data;

c. The data will be stored for the period necessary to answer the sent inquiries or until you withdraw your consent; cases of a longer period of data processing we describe in §4;

d. In connection with the processing, you have the right to access and access your data

rectification, the right to delete, the right to limit processing, the right to bring object to processing, the right to withdraw consent at any time (no effect for the lawfulness of the processing that was carried out before its withdrawal), the right to deletion data, the right to lodge a complaint to the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw);

e. Providing data is voluntary;

f. We may also process information that enables us to remember your preferences in the use of the website - we use "cookies" to collect this type of data (more information on this subject can be found in §9);

g. Your personal data may be processed in the form of analytical profiling, binding decisions are not automated, that is, they are never made without human intervention;

h. Data regarding the use of our website may be applied to internal statistical purposes and to develop and improve our products, services, methods communication and functionality of our website, and to ensure IT security. In this case, we only use aggregated data and we do not use names, e-mail addresses, or other information that allows you to be identified direct identification.

7. Candidates for work

If you are interested in our job or cooperation offers:

a. We process your data in order to conclude an employment contract on the basis and to the extent specified

in art. 22 (1) §1 of the Labour Code (Article 6 (1) (b) of the GDPR), or to conclude a civil law contract (Article 6 (1) (b) of the GDPR); we also process your personal data for the purposes arising from legitimate interests (Article 6 (1) (f) of the GDPR) in accordance with §4;

b. If you wish to participate in subsequent recruitments or be included in the documents application information that may be considered sensitive data, they will be processed on the basis of your consent voluntarily (Article 6 (1) (a) of the GDPR or Article 9 (2) (a) of the GDPR) a GDPR). You have the right to withdraw your consent at any time. Withdrawal compatible is not expected

impact on the lawfulness of the processing carried out before its withdrawal;

c. Recipients of data may be entities providing IT, hosting and consulting services

and other processors with whom we have concluded data processing agreements

personal;

d. The data will be stored for the duration of a given recruitment, unless you expressly express it consent to their further storage for the purposes of future recruitment; cases

a longer period of data processing is described in §4;

e. In connection with the processing, you have the right to access and access your data rectification, the right to delete, the right to limit processing, the right to withdraw consent

at any time (without affecting the lawfulness of the processing that has been carried out before its withdrawal), the right to object to the processing, the right to delete

data, the right to lodge a complaint to the President of the Personal Data Protection Office (ul. Stawki 2,

00-193 Warsaw);

f. Providing data results from the scope specified by the Labour Code or is a contractual requirement (in the case of employment based on a civil law contract) and refusal to provide them may

prevent the establishment of an employment relationship or conclusion of a contract.

g. your personal data will not be processed in the form of analytical profiling;

§ 4

Other grounds for processing

1. In addition to the situations listed in §3, we may process you in certain cases data also for other purposes. They may involve an extension of your storage period data.

2. For the purposes necessary to fulfil our legal obligations (Article 6 (1) (c) GDPR) we will process your data:

a. for the duration of the legal obligations imposed on us by the competent authorities regulations, including provisions of tax law, social security etc.

b. for the period in which certain legal provisions require us to store data (provisions these may provide for a different period of data storage).

3. In addition, we may also process your data for other purposes arising from ours legitimate interests (legal basis: Article 6 (1) (f) of the GDPR):

a. correspondence and contact with you;

b. establishing, defending and pursuing claims, including, inter alia, selling ours

receivables to another entity;

c. promotion of the company and our services;

d. creating compilations, analyses and statistics;

e. establishing business or partnership cooperation;

f. archiving;

g. considering complaints

4. Your personal data will not be processed on the basis of our legitimate interests

interests, if, in certain cases, your rights and freedoms prove to be against them

overriding.

§ 5

Laws

1. The right to access the added personal data and obtain a copy of them - we will grant you at your request

information whether we process your personal data. We are also bound to be separate

request, provide more detailed information on: purposes of processing, categories

personal data, data recipients or their categories, data storage period

personal data or criteria for its determination, source of data acquisition, about automated

the processing of personal data and the consequences of such data processing for you.

In the case of transfer of personal data to a third country, we will inform you

also about the security used for the transfer at your request. For you

we will also make a copy of your personal data on request. It will be made available to you

in the popular IT file format. The first copy will be made available free of charge.

However, for each subsequent one, we can charge a fee in the amount that we will determine on the basis of

on the provisions of the GDPR.

2. The right to rectify data - if it turns out that your personal data is incorrect, we will delete it

abnormalities. We will do it on our own initiative - or if you tell us about it

- at your request.

3. The right to data deletion, including the "right to be forgotten" - if you do not wish to

processing of personal data and we find that there are no other legal bases that make it possible

us processing your data - we will remove them from our databases. However, please note

that the deletion of certain data may prevent us from providing services to you - applicable to those services in connection with which it is necessary to process personal data that have been shared. For example, we will not be able to answer your questions and present you Our offer to you, if you request the deletion of your e-mail address. Despite such a request, in certain, however, we will be able to process some personal data on the terms specified in the GDPR due to e.g. legal obligations incumbent on us.

4. The right to limit processing - in the cases provided for by the GDPR, for you the request will limit the processing of your personal data. Simply put, limiting the processing of personal data prevents their use outside storage. In this case, any other activities on the data subject restriction of processing, they can only be performed with your consent.

5. The right to transfer data - on the terms provided for in the GDPR, you may request transfer of personal data saved in a standard file format suitable for machine readable. If your goal is to transfer them to another administrator, we will send a file containing your personal data directly to him.

6. Right to object - in some cases, even if we process personal data in accordance with the law, without your consent, you may request us to stop processing your data filing an objection. It will be justified if you can show that ours comply with the law, any actions violate your interests, rights or freedoms.

7. The right not to be subject to automated decisions in individual cases, incl. profiling - you have the right not to be subject to decisions that would be based solely on on automated processing, including profiling, if they were to cause them to Your legal effects or similarly significantly affect you.

8. The right to withdraw consent at any time - in the event that we have asked for your consent you can withdraw this consent at any time. If we do not have a separate basis processing, we will cease to use personal data for the purpose for which it was provided consent given. However, please note that withdrawing consent may sometimes make it impossible providing you with interesting content or information.

9. The right to lodge a complaint with a supervisory authority - if you believe that it is due to our actions your rights related to the processing of personal data have been violated, you may

file a complaint to the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw).

10. The rights listed above may be limited in certain situations, such as when we can demonstrate that we are legally obliged to process your data.

11. If you wish to exercise any rights you have, submit all you need to do appropriate request using the contact details indicated in § 1 or § 2.

§ 6

Data sources

1. As a rule, most of the data we process is information that you have provided to us of my own free will.

2. In some cases, we may process personal information that we are able to do inferring from you on the basis of other information you provide to us and which we obtain in the course of our relationships. This data will not be processed longer than that necessary for the purpose for which they were collected or will be promptly removed.

3. If we have not obtained personal data directly from you, we would like to inform you that:

a. the data may have been obtained from the person or entity that indicated you as persons representing or contacting;

b. in the case of persons participating in the recruitment process or interested persons establishing cooperation based on a civil law contract - personal data could be left obtained from recruitment agencies or HR consulting companies with whom we cooperate or our employees (in the case of orders);

§ 7

Technical and organizational measures

1. We undertake to properly protect your personal data in accordance with the internal ones

policies, orders, procedures and standards so that personal data is protected against unauthorized use or access, unlawful modification, loss or destruction.

2. We use high standard physical and logical security.

3. Your personal data will not be kept for longer than is necessary for the purpose for which have been collected, including the need to comply with legal obligations and for settling disputes, asserting or defending claims.

4. As part of ensuring the security of personal data processed, we undertake to considerations:

a. confidentiality - we will protect your data against accidental disclosure to persons the third;

b. integrity - we will protect your data against unauthorized modification;

c. availability - we will only provide access to you by authorized persons data only if necessary.

5. Your personal data may be processed by third parties only if such the entity undertakes to provide appropriate technical and organizational measures guaranteeing the security of personal data processing, as well as to keep this data confidential.

6. Each of our employees or associates who has access to personal data has appropriate authorization and is obliged to maintain confidentiality.

7. The personal data that you provide on our website is encrypted and protected with SSL certificate. It secures and confirms data transmission within the domain authenticity.

§ 8

Transfer of personal data outside the EEA

We do not transfer your personal data to countries and organizations outside the European Area Economic, where the law may not provide an adequate level of protection of personal data.

§ 9

Cookies

1. Our website uses "cookies".

2. "Cookies" are information in the form of small text files saved on

Your computers through the server. They are important because they allow the server to do it every time

reading information when connected to a specific computer.

3. Information collected using "cookies" does not always have to constitute personal data, however, they may be used to provide you with certain functions. Such data are encrypted in a way that prevents unauthorized access to them.

4. The software used for browsing websites is allowed by default placing "cookies" on your computers - using the browser settings website, you have given your consent

5. You can properly configure your browser to block automatic accepting "cookies" or obtaining information about the file being sent each time device. More information on the use of "cookies" and possible configurations can be found can be obtained in the settings of your browser. File usage restriction level "Cookies" may affect the availability and functionality offered by our website, including the possibility of blocking their full operation.

6. The website uses two basic types of cookies: session cookies and "persistent" cookies. Session cookies are temporary files that are stored on the user's end device until logging out or leaving website or disabling software (web browser). "Fixed" files cookies are stored on the user's end device for the time specified in cookie parameters or until they are deleted by the user.

7. Our website uses "cookies" in order to correctly configure, and in particular down:

- a. adapting the content of the website to your preferences;
- b. correct configuration of selected website functions, enabling in particular, verification of the authenticity of the browser session;
- c. recognition of the device and appropriate display of the website, adapted to Your individual needs;
- d. remembering your settings and personalizing the interface, e.g. in terms of the selected language or region;
- e. remembering the history of visited pages on the website in order to recommend content and size

the font, the appearance of the website, etc.

8. As regards information on user preferences collected by the Google network, which provides statistics of visits to the Website, the user can view and edit information resulting from cookies using the tool: <https://www.google.com/ads/preferences/>.

9. As part of our website, we may collect data about your activity.

The above data will be used for internal statistical and development purposes and improving our products, services, communication methods and the functionality of our websites, as well as to ensure IT security. In such a situation we only use aggregated data and we do not use names, e-mail addresses, or other information allowing for direct identification.

10. In many cases, web browsing software (browser

By default, it allows the storage of information in the form of cookies and other files similar technologies on the User's end device. The user can, however, in any time to change these settings. Failure to make changes means that the above-mentioned information may be available posted and stored on its end device, and thus that we will store and access information on the user's end device information.

11. From the level of the web browser used by the User, it is possible, for example, independently managing cookies. The most popular browsers include possibility: accepting cookies, which allows the User to fully use the options offered by websites; individual cookie management, websites selected by the User; specifying settings for different types of cookies, on example of accepting permanent files as session etc .; blocking or deleting cookies.

12. Comprehensive information is available in the software (web browser) settings. Details for people using individual web browsers, including Mozilla Firefox, Chrome, Opera, etc.

13. Please be advised that restrictions or exclusions of the use of cookies and other similar technologies may affect some of the functionalities available on our websites

14. The legal basis for our processing of this type of data is our legitimate interest (Art. 1 lit. f GDPR) consisting in particular in improving our website, in order to

ensuring high-quality services and functionality of our website.

15. The periods of personal data storage indicated above in this point will be happen most often. Due to the multiplicity of possible situations, any questions regarding periods of personal data storage in a given situation should be provided for the data contact indicated in § 1 or § 2.

§ 10

Final remarks

1. We reserve the right to make any changes to this Privacy Policy that may result from the need to adapt to changes in legal regulations or applicable standards privacy or related to the expansion of our offer.
2. We will inform you about any changes to data processing an appropriate message on our website.
3. This Policy is effective from February 16, 2022 and replaces the previous one.