

PRIVACY POLICY

KPS VENTURES SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ hereinafter referred to as the "KPS" is an owner and an operator of Calendar Portal for Civil Engineers ("Portal").

Data Controller

The Controller of personal data is KPS VENTURES SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (ul. Wileńska 69, 03-416 Warsaw, Poland, KRS: 0000689278), after referred to as "KPS".

Portal is and will be used solely for the purpose of managing time of cooperators of KPS. The above cooperators will be civil engineers performing house inspections commissioned by KPS on the basis of agreements between KPS and its cooperators. Information, including personal data disclosed and given by cooperators to KPS will be used only in order to commission a house inspection to a civil engineer-cooperator of KPS in a time suitable for such an engineers according to his calendar.

Data Collection Policy

Portal processes personal data according to the applicable law provisions, in particular pursuant to the 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 ("the GDPR") **solely for the purpose of performing the agreement between KPS and its cooperators-civil engineers.** Any inquiries submitted to us shall be processed while observing confidentiality and keeping a trade secret. Personal data and e-mail addresses will not be used for any purpose other than managing employees' working time.

In particular, personal data will not be used to provide commercial information, will not be transferred to third parties and will not be saved.

The Use of Google API

Portal uses Google API in order to synchronize the private calendar of a civil engineer-cooperator of KPS with the internal calendar of KPS electronic system. In order to do so, a civil engineer-cooperator of KPS must consent to access to sensitive scope of Google Calendar API (scope ./auth/calendar) which means consent to browsing, editing, making available and permanent deletion of all calendars, to which a civil engineer-cooperator of KPS has access in Google Calendar. Data will be processed solely for the purpose of adding events-commissions to civil engineers-cooperators of KPS for the purpose of downloading information on civil engineers' availability for accepting mandates (house inspections). Purpose and legal basis of data processing.

Processing of personal data shall take place:

- for a compliance with legal obligations (Art. 6 section 1 (b) of the GDPR)

Data is processed for the purpose of conducting an activity by KPS within the frames of a performance of the contracts concluded with the customers or for the purpose of a

performance of the activities prior to a conclusion of the contract, which are carried out upon customer's request.

- for a compliance with the legal obligations (Art. 6 section 1 (b) of the GDPR) or for the performance of the tasks carried out in the public interest (Art. 6 section 1 (e) of the GDPR)
- for the purposes of the legitimate interests pursued by KPS or the third party (Art. 6 section 1 (f) of the GDPR)

Recipients of personal data

Personal data may be shared to other recipients in order to fulfill the legal obligation incumbent on KPS, based on consent or for purposes resulting from the legitimate interests of the administrator. The data will not be shared for any other purposes

Duration of personal data retention

Personal data shall be processed for the period necessary for the purposes of the processing, in particular:

- ✓ within a scope of the performance of the contract concluded with KPS – until its completion, and thereafter for the period required by law or for the execution of any potential claims;
- ✓ within a scope of the fulfilment of the legal obligations imposed on KPS arising from conducting the activity and the performance of the concluded contracts – until a completion of these obligations by KPS;
- ✓ until KPS's legitimate interests that gave rise to the processing have been fulfilled or until you object to the processing unless there are legitimate grounds for further processing.

Rights of data subjects, whose data is transferred to KPS

A data subject, whose data is processed by KPS has a right:

- ✓ of access to personal data and its rectification, restriction of processing or erasure,
- ✓ to the extent that processing of personal data is based on your consent, to withdraw at any time the prior consent given to the processing of your personal data,
- ✓ to object at any time to the processing of your personal data for the reasons relating to your particular situation where KPS processes the data for the purposes based on its legitimate interests (Article 21(1) of the GDPR);
- ✓ to request the transfer of your personal data processed for the purpose of concluding and performing the contract or processed on the basis of the consent. The transfer shall involve the receipt of your personal data from KPS in a structured, commonly used and machine-readable format and the transmission of such data to another controller. The right to transfer data shall not apply to data that constitute a business secret;
- ✓ to file a complaint with a relevant EU data protection supervisory authority, if the processing of your personal data is found to violate the provisions of the GDPR

Necessity to transfer personal data

A provision of personal data is voluntary; however, it may be necessary to conclude and perform the contract.

In case of data processing for the marketing purposes, the provision of personal data may be necessary to receive marketing information.

Source of personal data

All personal data collected by the Center comes directly from customers

Processing of personal data for marketing purposes

Users' personal data will not be processed for marketing purposes

Profiling:

Personal data is not subject to automated decision making, including profiling.