

Privacy Policy & Data Protection Statement

1. Important information and who we are

Sofomo respects your privacy and is committed to protecting your personal data. This Privacy Policy will tell you how we use your personal data when you visit our website.

Purpose of this Privacy Policy

This Privacy Policy details how Sofomo collects and processes your personal data through your use of this website, including any data you may provide through the website when you browse or contact us.

It is important that you read this Privacy Policy together with any other privacy notice on our website from time to time so that you are fully aware of how and why we are using your data.

Who we are

- Sofomo is the Data Controller and responsible for your personal data (collectively referred to as, “we”, “us” or “our” in this Privacy Policy).
- Our full details are: Sofomo Spółka z o.o., Dmowskiego 3/69, 50-203 Wrocław, PL8982188103, Poland
- You can contact us through contact form on page <https://www.sofomo.com/>
- This Policy was last updated on 14th July 2023.

2. The Lawful Basis we use to process data

We will only ever process your information when we have a lawful basis to do so. The lawful bases includes;

- **Contract** – where we process your information to fulfil a contractual arrangement we have made with you.
- **Consent** – where we have asked you to provide explicit permission to process your data for a particular purpose (contact us) or you undertake action which requires us to respond or react to your request.
- **Legitimate Interests** – where we rely on our interests as a reason for processing, generally this is so our website can provide you with an appropriate user experience.
- **Legal Obligation** – where we have a statutory or other legal obligation to process the information, such as for the investigation of crime or legislative requirements in force from time to time.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identifiable characteristics have been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- a) Contact Data - means the data we use to contact you including your billing address, delivery address, email address and telephone number.
- b) Technical Data means details about the device(s) you use to access our website including your internet protocol (IP) address, browser type and version, location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- c) Usage Data includes information about how you use our website. This includes your browsing patterns and information such as how long you might spend on one of our webpages and what you look at and for on our website, the clickstream to and from our website, page response times and page interaction information such as scrolling, clicks and mouseovers.

We also collect, use and share aggregated and/or anonymised data ("Aggregated Data") such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

4. How is your personal data collected

We use different methods to collect data from and about you including:

- Direct interactions. We may collect your Contact Data, Contact Data, Transaction Data, Profile Data, Financial Data and Marketing and Communications Data when using our website, filling in forms or by corresponding with us by email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- Third parties may also provide us with personal data and information about your browsing habits, these include; Google Adwords, Bing Ads, Smartlook, Google Analytics Hotjar, LinkedIn Ads, Adroll.
 - o In order to effectively deliver our website and its services we may collect Technical Data such as IP address, Browser and Operating System data through; Amazon Web Services (AWS), DigitalOcean and Cloudflare.

Sofomo may, from time to time, change these third-party providers or technologies used in order to collect, process and store personal data in order to deliver the best possible user experience.

5. How we use your personal data

We only use your personal data when the law allows us to and where we have a lawful basis to do so.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to the Contact Us form on our website.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we intend to use your personal data. Where appropriate we identify our legitimate interests in doing so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To notify you in relation to our legal obligations and documents, including changes to our terms or Privacy Policy	(a)Contact	Necessary for our legitimate interests of ensuring our customers are updated on these changes.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a)Contact (b)Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
To deliver relevant website content, advertisements and other marketing material to you and measure or understand the effectiveness of the services we serve to you	(a)Contact (b)Technical (c)Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business to inform our marketing strategy and to improve our offering to you). Please note that where cookies are used for this purpose, this is covered separately by our Cookies Policy.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(b)Technical (c)Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). Please note that where cookies are used for this purpose, this is covered by our Cookies Policy.

6. International transfers

Whilst we are based in the European Economic Area (EEA), some of our external third parties are based outside EEA. In doing so, their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data retention

How long we use your Personal Data

We will only retain your personal data collected via our website for as long as necessary. This includes:

- Following a contact, us request and for three years after your enquiry is resolved
- Up to three years after you visit the website.

Retention of data will only ever be used to fulfil the purposes for which we collected it and where permitted by law to do so. This includes for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data as part of your legal right to be forgotten, see 'Your Legal Rights' Section 8 below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Legal rights

If you live within the EEA you have the right to make a complaint at any time to the Supervisory Authority for data protection issues within your country. A full list of member states Supervisory Authorities can be found at https://edpb.europa.eu/about-edpb/board/members_en

We would however, appreciate the chance to deal with your concerns before you approach a Supervisory Authority so, where applicable, please consider contacting us directly in the first instance.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (known as a 'data subject access request'). To receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you (known as the 'right to data rectification') to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data (known as the 'right to be forgotten') to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your

personal data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data (known as the 'right to data portability') to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data (known as the 'right to withdraw consent'). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please use the contact form on page <https://www.sofomo.com/>.

You do not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and have a lawful basis to do so.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.