



A R C H I M E D E S

Privacy policy Archimedes Ltd.

Introduction

- 1) Archimedes Sp. z o.o. with its registered office in Toruń, ul. Polna 133, National Court Register 26946 (hereinafter: Archimedes) makes every effort to protect the personal data of the Users of the www.archimedes.pl website from being available to unauthorized persons, being taken away by an unauthorized person, processing in violation of the applicable laws and from change, loss, loss or damage and to respect the privacy of each User.
- 2) Users' personal data are processed in compliance with the requirements of generally applicable law, in particular the Act of 10 May 2018 on the protection of personal data (Journal of Laws 2018, item 1000) and from the date of application, i.e. 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing of Directive 95/46/EC (General Regulation on Data Protection or RODO, OJ L 119, 4.5.2016, p. 1-88).
- 3) This Privacy Policy (hereinafter referred to as the Policy) defines the principles of processing and protection of Users' personal data by Archimedes. The Policy regulates the types of personal data collected by Archimedes, the way the data is used, Users' rights, categories of entities to whom the data is made available, information concerning cookies. The Policy also defines the measures of personal data protection and security as well as the manner of contact concerning the personal data protection measures and methods used by Archimedes.

I. Basic concepts

- personal data - any information relating to an identified or identifiable natural person, e.g. name, telephone number, address, ID card number. An identifiable person is a person whose identity can be directly identified or indirectly, in particular by reference to an identification number or to one or more factors specific to its physical, physiological, mental, economic, cultural or social characteristics. Information shall not be deemed to identify a person if it would involve excessive costs, time or action;
- data processing - any operation performed on personal data, such as collection, recording, storage, processing, alteration, sharing and deletion, and especially those performed on information systems;

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- data protection breach - a breach of security leading to accidental or unlawful damage, loss, modification, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise processed;
- User - an individual whose data is processed by Archimedes;
- Customer - a entity to whom Archimedes provides services or purchases goods from Archimedes.

II. Personal Data Administrator

The administrator of the Users' personal data is Archimedes Ltd. with its registered office in Toruń 87-100, at 133 Polna Street, entered into the register of entrepreneurs kept by the District Court in Toruń, VII Economic Department of the National Court Register, under National Court Register number 0000026946, with a share capital of 150,000 PLN, fully paid-up, VAT ID 879-228-16-21, REGON 871554480.

The Inspector of Personal Data Protection supervises the observance of the principles of personal data processing and security at Archimedes. Contact the inspector daneosobowe@archimedes.pl address for correspondence: 133 87-100 Polna Street - Toruń.

III. Principles of collecting Users' personal data

- 1) To the extent permitted by law, Archimedes may collect information on Users using various sources.
- 2) Archimedes, as an entity processing personal data within providing services, obtains personal data of the Users first of all directly from its Customers or on the basis of contracts of entrustment concluded with the Customers to process personal data in order to perform the contract of providing services.
- 3) Archimedes obtains personal data, in particular, in terms of:
 - contact information (such as name, address of residence/residence/correspondence/business, e-mail and telephone number);
 - business contact information (such as position, department and name of the institution);
 - VAT invoicing information (such as VAT ID, REGON)
 - the content provided (such as photos, articles and comments).
 - collecting statistics the Administrator uses Google Analytics; this way, User's data will be obtained by Google, 1600 Amphitheatre Parkway Mountain View, CA 94043 United States
 - targeting ads via marketing tools used by and provided by Facebook Inc., 1601 S. California Ave. Palo Alto, CA 94304, USA.
- 4) In order to provide Users with additional information, the website www.archimedes.pl contains links to websites administered by entities independent of the Administrator, i.e. Facebook, Instagram, LinkedIn or YouTube. They may have separate clauses or privacy policies. The Administrator recommends reading their content.

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- 5) With regard to all websites linked to the Website, which are not owned or controlled by the Administrator, the Administrator does not take any responsibility for their content or for the rules of confidentiality protection applicable to Users. When entering a website that contains such links, User's browser will establish a direct connection with servers of the social media administrators (service providers). The content of the plugin is integrated with the website and transmitted directly by the service provider to the User's browser. By this integration, service providers receive information that the User's browser has displayed the Administrator's website, even if he/she does not have a profile on the platform or is not currently logged in. Such information (along with the IP address) is sent by the User's browser directly to the server of a given service provider (some servers are located in the USA) and stored there. If the User has logged in to one of the social networking platforms, the service provider will be able to assign the visit on the Administrator's website directly to the User's profile on the social network platform. If the User uses a given plug-in, for example by clicking "Like" or "Share" button, the relevant information will also be sent directly to the server of the service provider and stored there. In addition, this information will be published on a social network platform and will be available to User's contacts. The purpose and scope of data collection and their further processing and use by service providers, as well as the possibility of contact, as well as the User's rights in this regard and the possibility of making settings ensuring the protection of privacy are described in the privacy policy of individual service providers.
- 6) If the User is not willing to have his data being collected by the Administrators website and assigned to the social networking profiles, the User shall log out before entering the site. The User can also completely prevent the loading of plugins on the website by using appropriate extensions for his browser, e.g. blocking scripts.

IV. Processing of personal data

- 1) Archimedes ensures control over the type and scope of personal data processed, the period and method of processing, as well as persons authorised to process them.
- 2) Archimedes makes every effort to protect the personal information and data it collects.
- 3) Archimedes ensures appropriate administrative, technical and physical protection of personal data provided by the User against accidental, unlawful or unauthorized damage, loss, modification, access, reveal or use.
- 4) Archimedes stores personal data only for as long as it is necessary to achieve the purpose for which the personal data has been collected, unless otherwise is required by law.
- 5) Archimedes takes measures to destroy or permanently deprive the personal data of its identification if this is required by the provisions of the applicable law or if the personal data are no longer needed for the purpose for which they were collected.
- 6) Archimedes declares that:
 - it processes personal data in accordance with the law;
 - collects personal data for designated, lawful purposes and does not further process the data contrary to those purposes;

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- keeps the personal data in a form that allows the identification of the persons concerned for no longer than is necessary to achieve the purpose of the processing;
 - personal data that are essentially correct and adequate in relation to the purposes for which they are processed.
- 7) Has access to personal data: Archimedes, its written authorized employees, associates and persons providing services to it. Access to personal data by the aforementioned persons takes place only for the purpose and scope specified by Archimedes.
 - 8) Archimedes keeps a register of persons authorised to process them. Persons who have been authorised to process the data are obliged to keep their personal data in strict secrecy and ways of protecting them.
 - 9) Archimedes and persons authorised to process such data apply technical and organisational measures ensuring protection of the personal data being processed.
 - 10) The data collected by Archimedes may be used for the following purposes among others:
 - providing, administering and informing about services by Archimedes;
 - risk assessment and improvement of Archimedes' operations (including the development of its services, communication management, analysis and improvement of its services);
 - sending a newsletter;
 - assessing your interest in employment and contacting you about employment opportunities with Archimedes;
 - as required by law or in connection with an ongoing legal proceeding or a request from a public authority to provide information held by Archimedes;
 - ensuring compliance with data protection regulations and Archimedes' internal regulations in this respect.
 - performance of the employment contract, including performance of duties specified in regulations or collective consents, management, planning and organization of work, equality and diversity in the workplace, health and safety at work and for the purposes of individual or collective performance of rights and benefits related to employment, as well as for the purposes of termination of the employment relationship.
 - keeping records on matters related to the employment relationship and keeping personal files of employees, as well as keeping the indicated records and personal files in conditions not threatening damage or destruction.

V. Sharing and entrusting personal data processing

- 1) Archimedes does not make available, sell or otherwise disclose the personal data collected concerning the Users, except as described in the Policy or when it results from generally applicable laws.
- 2) Archimedes may entrust the processing of personal data to service providers acting on its behalf. In accordance with the consents on entrusting the processing of personal data concluded with them, Archimedes requires from these providers a services in accordance with the law, a high level of privacy protection and security of personal data processed by them on behalf of Archimedes.

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VI. Users' rights

- 1) The User has the right to control the processing by Archimedes of data concerning him/her, in particular to obtain information on the purpose, scope and manner of data processing.
- 2) The User has the right to access his/her personal data, as well as to make changes, supplement, correct and updates, as well as demand their anonymisation, temporary or permanent suspension of their processing or their deletion if they are incomplete, outdated, untrue or have been collected in violation of the law, or delete them on the principles set out in the law, with the reservation that Archimedes is entitled to further processing of personal data on the basis of the law.
- 3) If the processing of personal data is based on the User's permission, the User has the right to withdraw the permission to process his/her personal data by reporting this fact in writing to the following address Archimedes. In such situations Archimedes will adjust to the User's decision in relation to future activities.
- 4) The User has the right - in cases provided for by law - to demand from Archimedes to stop processing their personal data, as well as to object to the processing of their personal data.
- 5) Requests for information, withdrawal of permission for the processing of personal data, as well as the realization of other rights of the User resulting from the legal regulations should be made by sending an e-mail to adres: daneosobowe@archimedes.pl.

VII. Cookie files and analysis software

- 1) Archimedes, its service providers and business partners collect certain information by automatic means, such as cookies, when browsing the www.archimedes.pl website. The information collected in this way may include: IP address, browser type, operating system, URLs visited, as well as information about activities on the website. Archimedes encourages you to read the Archimedes cookie policy available at www.archimedes.pl.
- 2) Using the www.archimedes.pl website does not require logging in, setting up an account or providing your data except for the use of forms. In order to monitor the www.archimedes.pl website Archimedes may use analysis software belonging to third entities such as Google Analytics. Google Analytics can be disabled by means of the extension of the browser, which can be downloaded from: <https://tools.google.com/dlpage/gaoptout>.
- 3) More information about the cookies used by Google Analytics, which is an online tool used to analyze website statistics (including reports on demographic data and interests), can be found in the Google Analytics Privacy Policy.
- 4) For convenience and to provide Users with additional information, the www.archimedes.pl website contains links to websites administered by entities independent of Archimedes. These links may have separate clauses or privacy policies. Archimedes encourages you to read them. With respect to any sites linked to the Service that are not owned or controlled by

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Archimedes, Archimedes assumes no responsibility or liability whatsoever for their content, use by Users of such sites or their privacy policies.

- 5) The www.archimedes.pl website contains order and contact forms which enable customers to place orders for products and services offered by Archimedes. The data collected in this way is mainly used to contact the customers and fulfill obligations to them.
- 6) In particular, to subscribe to an electronic and free of charge newsletter issued by Archimedes, you must provide your e-mail address in the appropriate form. This field is obligatory. The data obtained in the above mentioned way are added to the e-mailing list. The e-mail address is necessary to be able to send the reader the newsletter ordered by him.
- 7) Customers' contact information is also used to contact them when necessary (e.g. in case of order confirmation). At any time, users of the Services who have ordered a newsletter have the possibility to resign from receiving it.
- 8) The legal basis for the processing of your personal data in the case of the newsletter is the permission of the Client expressed by ticking the relevant content of the checkbox when subscribing to the newsletter. Such permission can be withdrawn at any time by unsubscribing from the newsletter.
- 9) Through the website www.archimedes.pl - "Career" tab, the recruitment of new employees, trainees, apprentices, partners for Archimedes may be conducted. Personal data obtained in this way is used only for the purposes of recruitment in the current and future recruitment processes. By filling in the recruitment form, the User agrees to participate in current and future recruitment processes conducted by Archimedes Ltd. in accordance with the provisions of the Personal Data Protection Act of 10 May 2018. This consent applies to all documents submitted within the recruitment processes.
- 10) Other information is used to establish the profile of persons using the services and ordering newsletters and allows to better adjust the content of the website and the newsletter to the needs of persons using this form of information. However, their processing always takes place in accordance with the provisions of the Personal Data Protection Act and the Act on Providing Services by Electronic Means.

VIII. Changes and updates to the Policy

The policy may be modified from time to time. Modifications are aimed at taking into account changes in Archimedes' practices regarding the handling of personal data and strengthening the system of personal data protection in Archimedes.

Significant changes in the Policy will be signalled by means of clearly visible notices placed in the Service. At the top of the Policy page there will be information about the date of its latest update.

IX. Contact

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Archimedes
133 Polna Street
87-100 Toruń
phone: +48 56 657 73 00
info@archimedes.pl

Dąbrowa Górnicza Branch:
136 Tworzeń Street,
41-306 Dąbrowa Górnicza
phone: +48 32 730 10 10
dabrowa@archimedes.pl

VAT ID 8792281621
REGON 871554480
NCR 0000026946
www.archimedes.pl

THE DISTRICT COURT IN TORUŃ
VII ECONOMIC DEPARTMENT

THE SHARE CAPITAL OF THE
COMPANY - 150 000.00 PLN

You may contact Archimedes or the Data Protection Officer daneosobowe@archimedes.pl at any time for information on whether and how Archimedes uses or intends to use its personal data, as well as for any questions or comments about this Policy.

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87-100 Toruń
phone: +48 56 657 73 00
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Dąbrowa Górnicza Branch:
136 Tworzeń Street,
41-306 Dąbrowa Górnicza
phone: +48 32 730 10 10
dabrowa@archimedes.pl

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