

## Privacy Policy and Cookies Policy

This page is dedicated to the privacy policy ("Privacy Policy") and the cookies policy ("Cookies Policy"). We fully understand the concern about personal data, hence we have prepared this document for you, where you will find the principles of personal data processing by us, as well as information on the use of cookies and other tracking technologies in connection with the use of the website: [www.pro-enterprise.com](http://www.pro-enterprise.com) ("Website").

Your personal data is processed in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 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 (General Data Protection Regulation) ("GDPR").

We guarantee the confidentiality of all personal data provided to us. We ensure the adoption of appropriate data security and protection measures required by data protection regulations. Personal data is collected with due diligence and adequately protected from access by unauthorized persons.

In accordance with Art. 13, Art. 14, and Art. 26 of the GDPR, we inform you that we process your personal data together and inform you about the basic content of the agreements.

### I. Personal Data Administrator Information

The administrator of personal data obtained in connection with the jointly conducted activity, including through the Website: potential and proper clients and contractors, persons representing the aforementioned entities, employees and collaborators of these entities, visitors to the Website, individuals visiting the Pro-Enterprise social media portals (LinkedIn, Facebook), and other individuals contacting us, is the Pro-Enterprise:

- Pro-Enterprise sp. z o.o. with its registered office in Warsaw, at 45 Wielicka Str. L1, 02-657 Warsaw, registered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register under the number KRS 0000379085, NIP 5213595497, REGON 142830007, with a share capital of PLN 5,000.00. The company enters into agreements with clients in the field of consulting and carries out sales activities.
- The aforementioned entity sets the goals and methods of processing personal data in connection with the realization of the business goal - acquiring customers and offering clients services in the field of consulting, as well as processing data for the purposes of direct marketing of our offer and pursuing any claims related to these purposes.
- Pro-Enterprise sp. z o.o. maintains and directly manages the website available at <https://pro-enterprise.com/>, which is maintained on the servers of the provider Cyber\_Folks S.A. with its registered office in Poznań - you can find more information about data processing by the provider here: <https://cyberfolks.pl/pomoc/>.

### II. Contact Details

The company designates the contact point for natural persons below, which is also the appropriate contact for the realization of data subjects' rights. This means that in case of any doubts related to the Privacy Policy and in order to obtain information about the processing of personal data by us, including also in order to exercise your rights, you can contact us:

- by email – sending a message to the address: [ahansen@pro-enterprise.com](mailto:ahansen@pro-enterprise.com)
- in writing – sending a message by traditional mail to the address: Pro-Enterprise Sp. z o.o., business address: 45 Wielicka Str. L1, 02-657 Warsaw, with the note "Data Protection".

### III. Purposes, legal bases for processing, and the period of data processing

Purpose	Legal basis	Processing time
<b>Actions aimed at concluding an agreement, and then the implementation of the provided services</b> (concerning potential and actual clients/contractors; persons representing the aforementioned entities, as well as employees and collaborators of these entities)	- Art. 6(1)(b) GDPR (concerning potential and actual clients/contractors) - Art. 6(1)(f) GDPR (concerning representatives, employees, and collaborators of the aforementioned entities, e.g., contact persons) - Legitimate interest: ensuring proper contract fulfillment and business contact.	- For the duration of the contract, and then for the time until the expiration of the limitation periods for claims arising from the contract, in accordance with applicable legal provisions. - Until the cessation of the legitimate interest or until you object to such processing, but no later than the expiry of the periods mentioned in point a above.
<b>Contact</b> (concerning potential and actual clients/contractors; persons representing the aforementioned entities, as well as employees and collaborators of these entities; other individuals contacting us) Contact via email, phone, through the form available on the Website, or by traditional mail. We respond to questions asked to us, provide information, respond to inquiries for offers. By contacting us electronically, by phone, or by traditional mail, you provide us with your contact details and your name and surname (these are necessary for contacting you and responding to your inquiry) and the content of the inquiry.	- Art. 6(1)(f) GDPR – Legitimate interest: identification of the sender and handling inquiries, as well as building and developing relationships with our clients or potential clients and aiming to sell our services. - Art. 6(1)(a) GDPR – Your consent	For the period of contract execution – if applicable, for the time necessary to realize contact, respond to questions, or send requested material, and then for evidentiary purposes until the expiration of the limitation periods for claims in accordance with applicable laws. - Until the withdrawal of your consent, but no later than the end of cooperation – if applicable, or until the end of the calendar year following the year in which the matter was resolved or contact was concluded.

<p>- Additionally, in the message content, you may also include other personal data beyond those necessary to contact you and respond to your question. In such a case, the legal basis for processing is your consent expressed through a clear affirmative action (i.e., placing this data in the message sent to us). However, we request that you provide us only with the necessary data for establishing and managing contact.</p> <p>We inform you that the Website is integrated with the CRM service, which means in particular that by contacting us via the form available on the Website, your data is automatically saved in this system. Information about the service provider and regarding GDPR compliance of this system – see below in VII. Recipients of personal data.</p>		
<p><b>Establishment, pursuit, and defense of claims</b> (concerning all categories of persons mentioned above – see I. Personal Data Administrator Information)</p>	<p>Art. 6(1)(f) GDPR – Legitimate interest: enforcement of rights in the event of a dispute</p>	<p>For the time until the expiration of the limitation periods for claims arising from the purposes of processing – in accordance with applicable legal provisions.</p>
<p><b>Fulfillment of legal obligations incumbent on us including accounting, bookkeeping, and financial reporting</b> (concerning potential and actual clients/contractors; persons representing the aforementioned entities, as well as employees and collaborators of these entities) e.g., if we issue you an invoice, we process your personal data as necessary for issuing the invoice. Moreover, all issued invoices are included in the accounting documentation, hence your data will also be processed within this documentation.</p>	<p>Art. 6 (1) (c) GDPR – Processing is necessary for compliance with a legal obligation to which the controller is subject.</p>	<p>For the period required by law, in particular for storing accounting documents (as a rule, for 5 years after the year in which the legal event occurred that obligated the issuance of the accounting document).</p>
<p><b>Direct marketing of our offer</b> (concerning potential and actual clients/contractors; persons representing the aforementioned entities, as well as employees and collaborators of these entities; individuals visiting our Website)</p>	<p>Art. 6(1)(f) GDPR – Legitimate interest: promotion of our services. In the case of conducting marketing using your phone number or email address, we will first obtain consent for the communication channel in accordance with the Act on Providing Services by Electronic Means or the Telecommunications Law.</p>	<p>Until you object to such processing, and then for the period required by legal obligations imposed on us and/or until the expiration of the limitation periods for claims related to the purposes of processing in accordance with applicable laws. Until you withdraw your consent, but no later than the period necessary to achieve the purpose for which the data was collected.</p>
<p><b>Processing of data within Pro-enterprise social media profiles (Facebook and LinkedIn)</b>          - We have the following accounts on LinkedIn: Pro-enterprise (managed by Pro-enterprise Sp. z o.o.)          - On Facebook, we have an account for Pro-enterprise Sp. z o.o. directly managed by this company (concerning individuals visiting our profiles on social media platforms, through which they interact with us) We process personal data of users of the aforementioned social media platforms when they visit our profiles or interact with them (sending messages, likes, comments).</p>	<p>Enabling contact with users of the platforms, promotion of our activities and informing about them, including through the support of contact using tools provided by these services, conducting informational and marketing activities, as well as for analytical and statistical purposes</p>	<p>Until the cessation of the legitimate interest or until you object to such processing (you can object by withdrawing your interaction, e.g., retracting a like, deleting a comment), and then for the period required by legal obligations imposed on us and/or until the expiration of the limitation periods for claims related to the purposes of processing in accordance with applicable laws.</p>
<p><b>Statistics and analyses</b> (concerning individuals visiting the website)</p>	<p>Art. 6 (1) (f) GDPR – Legitimate interest: improving the activities jointly conducted by us through insights drawn from statistical actions</p>	<p>Until the cessation of the legitimate interest or until you object to such processing, and then for the period required by legal obligations imposed on us and/or until the expiration of the limitation periods for claims related to the purposes of processing in accordance with applicable laws.</p>
<p><b>Processing of Cookies and other tracking technologies</b> (concerning individuals visiting the website)</p>	<p>Art. 6 (1) (f) GDPR – Legitimate interest: enabling the proper display and operation of our Website, including the configuration of the</p>	<p>Until the cessation of the legitimate interest or until you object to such processing, and then until the expiration of the limitation periods for</p>

Website, to allow setting up the Service's functions and content according to the User's preferences; ensuring server security (necessary cookies). Tailoring the Website's content to the needs of Users, ensuring optimization of the use of the Website for marketing, statistical purposes, sharing social features. In the case of conducting the aforementioned activities using cookies, we will first obtain your consent for cookies to be stored on your device - legal basis for processing: Art. 6 (1) (a) GDPR.

claims related to the purposes of processing in accordance with applicable laws. You can return to your cookies preferences settings at any time, including to withdraw previously given consents for the installation of individual cookies – more information on this topic can be found below in the Cookies Policy. The storage periods for individual files are indicated directly in the cookie preferences banner located at the bottom of the Website.

#### **IV. Voluntariness of Providing Data**

Providing your personal data is always voluntary, but necessary for actions such as entering into a contract, its conclusion, and execution, contacting us, or sending you our offer.

#### **V. Source of Obtained Data**

We may have obtained data from:

- a. Directly from the data subject (i.e., directly from you);
- b. From entities we collaborate with (our clients or contractors) who identify you as a representative or appropriate contact person. The data we receive in such cases usually includes your business contact information or data contained in a power of attorney, CEIDG (Central Registration and Information on Business) or KRS (National Court Register), if you represent a given entity;
- c. From the Central Registration and Information on Business, the National Court Register, or other publicly available sources;
- d. From external partners we collaborate with, providing customer acquisition and delivery services.

#### **VI. Rights of Data Subjects**

In connection with the processing of your personal data by us, you have the following rights:

- a. The right to request access to your personal data, rectification, deletion, or restriction of processing;
- b. The right to object to processing;
- c. The right to data portability;
- d. The right to withdraw consent to the processing of personal data for a specific purpose if you have previously given such consent. Withdrawal of consent does not affect the legality of the processing carried out on the basis of consent before its withdrawal.

You also have the right to lodge a complaint with the supervisory authority, i.e., the President of the Personal Data Protection Office. More information on filing complaints is available on the office's website: <https://uodo.gov.pl/en/p/complaints>. You can exercise the above rights according to the rules described in Articles 15 - 21 of the GDPR.

#### **VII. Recipients of Personal Data**

In connection with our activities, we may share personal data with entities whose services we use for processing, such as:

- a. Employees or collaborators;
- b. Service providers, e.g., entities providing accounting, legal, IT, audit, hosting services, providers of email services and office applications, and invoicing tools, entities providing advertising or marketing services, subcontractors, i.e., entities to whom we outsource the execution of our services; postal and courier services, banks, payment service providers; and;
- c. State bodies or other entities authorized under the law.

#### **VIII. Automated Decision Making**

We do not make decisions based solely on automated processing, including profiling, that would have legal effects on you or similarly significantly affect you.

#### **IX. Transfer of Personal Data Outside the EEA**

Your personal data will be transferred outside the European Economic Area (EEA) to recipients in countries like Saudi Arabia, Bahrain, Kuwait, Oman, Qatar, United Arab Emirates; ensuring that such transfer complies with Chapter V of the GDPR and entities that, according to the European Commission's decision, belong to non-EEA recipient countries providing an adequate level of personal data protection in line with GDPR standards; using standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR and binding corporate rules approved by the competent supervisory authorities.

On our Website, we use tools like:

- a. Facebook Pixel – an analytical tool that allows measuring the effectiveness of advertisements based on the analysis of actions taken by users on the site, provided by Meta Platforms Ireland Ltd based in Ireland – its parent company, Meta Platforms, Inc., is based in the USA. More information about data processing on Facebook can be found at this link: <https://www.facebook.com/privacy/explanation> (policies effective from 26.07.2022 <https://www.facebook.com/privacy/policy>). Regarding personal data contained in event data related to the actions of individuals on websites and applications of Users integrating Facebook's business tools, where the processing is jointly determined by the Administrator and Facebook, the Administrator and Facebook Ireland are joint controllers of personal data according to Article 26 of the GDPR. More information, including details on the type of collected and transferred data, can be found at:

[https://www.facebook.com/legal/terms/businessstools\\_jointprocessing](https://www.facebook.com/legal/terms/businessstools_jointprocessing), and the joint administration agreement can be found at: [www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)

- b. Google Analytics – a tool for analyzing the Website, to which we transmit information collected via cookies (statistical information), these informations are anonymous – more about this and the browser add-on that blocks Google Analytics can be found at <https://tools.google.com/dlpage/gaoptout?hl=en>; and Google Ads – a service related to displaying advertisements to Users. The provider of these services is Google LLC based in the USA and Google Ireland Limited based in Ireland.

Privacy policy: <https://policies.google.com/privacy>. GDPR compliance policies: <https://policies.google.com/privacy/frameworks>, <https://business.safety.google/gdpr/>.

For work in our organization, we use office tools provided by:

Microsoft Corporation Microsoft Way, based in the USA, for the Microsoft 365 tool, including MS Teams, MS Office. The content of European Microsoft 365 users is stored by default in Microsoft's European data centres. Within the MS Teams tool, telemetry and participant data are transferred outside the EEA to the US. Microsoft processes technical data to ensure security and improve selected features, while it processes user data for, among other things, identity management. The data in question is administered by Microsoft. For privacy information: <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>.

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## Cookies and Other Tracking Technologies

Cookies are text files that are informational data related to the use of websites. These files help recognize a user's device during visits to websites and distinguish it from other users. They are stored on the users' devices. Among other things, they allow for identifying the type of user device and displaying web pages tailored to individual preferences.

Besides cookies, there are also other similar technologies that allow for the unique identification of a device by a service. Cookies are harmless to users and their devices, as they do not affect how they operate. Cookies do not cause configuration changes in end devices or in the software installed on these devices.

Our Website uses cookies to provide you with the best experience related to using the Website.

Cookies allow:

- Ensuring the proper functioning of the Website as you expect,
- Improving the speed and security of using the Website,
- Enhancing features available to you on the Website,
- Utilizing analytical tools,
- Utilizing marketing tools,
- Displaying videos from YouTube and Vimeo on the pages,
- Providing social features.

### Consent to Cookies

During the first visit to our Website, information about the use of cookies is displayed with the possibility of choosing preferences according to the information displayed in the pop-up window. Remember that essential cookies for using our Website are automatically installed on your device. Their use is necessary to provide telecommunication service (data transmission to display content) - Users cannot opt-out of these cookies if they want to use the Website. Other cookies (e.g., analytical or marketing) are not automatically installed. For these, the User can give voluntary consent at the first entry to our website. Consent is given by clicking the consent button on the banner that appears upon entering the website. Only then are we authorized to install these cookies according to the browser settings used by the User. The User may also consent to the installation of selected cookies only, for this purpose, it is enough that the User selects the files they consent to install on the pop-up banner with cookie preferences. Such consents can be withdrawn at any time. To do this, click the cookie preferences icon located in the bottom bar of the Website and, depending on your preferences, click withdraw consent or otherwise adjust cookies to your needs. Consent can also always be withdrawn through the browser settings. Below are links to instructions on how to do this in selected browsers:

**Mozilla Firefox:** <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

**Safari:** <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

**Chrome:** <https://support.google.com/chrome/answer/95647>

Remember that restricting the use of cookies may limit the use of certain services provided by Us through the Website and, in some cases, may prove impossible.

We use two types of Cookies:

- Session cookies: remain on the User's device until leaving the website or turning off the web browser, after which they are permanently deleted from the device.
- Persistent cookies: are stored on the User's end device for the time specified in the file or until they are deleted by the User, used, among other things, to remember the User's preferences when using the Website or to display personalized ads.

### Own Cookies

Cookies can be divided into our own and those from third parties. As for our own cookies, we use them for the proper operation of the Website.

### Third-Party Cookies

Our Website uses functions provided by third parties, which involves the use of cookies from third parties. The use of such cookies has been described below.

### Analysis and Statistics

We use cookies to track site statistics, such as the number of visitors, the type of operating system, and the web browser used to browse the site, the time spent on the Website, visited subpages, etc. We use the Google Analytics tool for this purpose. The information collected in this regard is completely anonymous and does not allow for your identification. For this purpose, Google LLC cookies regarding the Google Analytics service are used.

Using Google Analytics services involves implementing the tracking code provided by Google into our Website code. This code is based on cookies but can also use other tracking technologies.

### **Marketing**

We use Facebook and Google Ads marketing tools to direct ads to you on these services. For this purpose, we have implemented Facebook Pixel and Tracking Code on our Website code that remembers your visits. For this purpose, cookies from Facebook and Google are used.

### **Social Features**

We provide the possibility to use social features such as sharing content on social networks and subscribing to a social profile. The use of these functions involves the use of cookies from social network administrators such as Facebook, YouTube, LinkedIn.

- We use Google Analytics analytics tools that collect anonymous information about your visit to the site, such as pages viewed, time spent on the site or transitions between different pages. This involves the use of cookies from Google. More information on the scope and principles of data collection can be found at: <https://www.google.com/intl/pl/policies/privacy/partners>.
- We use remarketing tools Facebook Pixel, Google Ads to target ads to you. This involves the use of cookies from Google and Facebook.
- On the Site, we display videos from YouTube. When you click on a video to watch it, if you are logged into your account, YouTube may personally link your viewing behaviour. This can be prevented by logging out of your YouTube account first. If you start a video on YouTube, the provider uses cookies that collect information about how you use the service. If you have blocked the storage of cookies for Google-Ad, you should not encounter such cookies when watching videos on YouTube. However, YouTube also stores non-personal user data in other cookies. If you wish to prevent the installation of cookies, please disable cookies in your browser. YouTube's privacy policy is available at: <https://www.google.de/intl/pl/policies/privacy/>.
- We provide the possibility to use social features such as sharing content on social networks and subscribing to a social profile. The use of these functions involves the use of cookies from the administrators of social networks such as Facebook, YouTube or LinkedIn. The privacy policies of the aforementioned social networks can be found at the following addresses:

**Facebook** - <https://www.facebook.com/privacy/explanation/> (rules, revisions to come into effect from 26.07.2022)

<https://www.facebook.com/privacy/policy>)

**Youtube** - link to policy is above - see third dot from top

**LinkedIn** - <https://pl.linkedin.com/legal/privacy-policy>

### **Server Logs**

Using the Website involves sending queries to the server on which the Website is stored. Each query directed to the server is recorded in the server logs. Logs include, among others, your IP address, server date and time, information about the web browser, and the operating system you use. Logs saved and stored on the server. The data stored in server logs are not associated with specific individuals using the Website and are not used by us to identify you. Server logs are only auxiliary material used to administer the Website, and their content is not disclosed to anyone except those authorized to administer the server.

### **Final Provisions**

1. The Privacy Policy and Cookies Policy are continuously reviewed and updated as necessary. The last update of the Policies took place in June 2024.
2. The Policies were last updated in June 2024.