

# **Data Protection Policy**

## **Introduction**

This Privacy Policy sets out how we collect, use, disclose, store and protect your personal information. This Privacy Policy applies to each HashUp P.S.A. website where the Privacy Policy appears in the footer and to each HashUp P.S.A. application, service or tool (collectively, the "Services") to which this Privacy Policy applies, regardless of how you access or use them, including through mobile devices.

By using our Services, applications and/or providing any information to us, you accept the provisions of this Privacy Policy and agree or acknowledge that we collect, use, disclose, store and protect your personal information in accordance with this Privacy Policy. If you do not provide us with the information we require, we may not be able to provide you with all of our Services.

## **What does the Privacy Policy cover?**

This Privacy Policy is intended to inform you about the processing of your personal data that is collected when you visit one of our websites.

## **Who is the administrator of personal data?**

The administrator of your personal data - the entity that collectively determines the purposes and means of data processing - is Hashup P.S.A., registered by the District Court in Warsaw under KRS (National Register of Court) number: 0000927509, NIP: 5272974670, REGON: 520231990, based in Warsaw, at Al. Jana Pawła II 27.

We have appointed a data protection officer - a person from whom you can obtain detailed information about the processing of your data.

**Contact us:** [dataprotection@hashup.it](mailto:dataprotection@hashup.it)

## **Personal Data**

"Personal data" is information that can be linked to a specific person or can be used to identify a specific person, whether through this data or this data and other information we have or may have access to.

Any personal information you provide to us will be treated in accordance with the highest standards of security and confidentiality.

## **Collection and use of personal data**

We collect, process and store personal information collected from you and from other devices (including mobile devices) you may use when you: use our Services, submit information to us on a web form, update or add information or resolve a dispute or otherwise correspond with us in connection with our Services.

Personal data you provide to us:

- a) Your IP address
- b) The type of device you use
- c) Browser type, version and language
- d) Type and version of your operating system
- e) Your activity on the Site
- f) The number and frequency of visitors to the Site
- g) E-mail address

To make the overall users experience better, HashUp P.S.A. may collect data through cookie files. Cookies are small files invented to track, save and store information about usage of the website and user's interaction on it that are saved to the user's computer. Collecting this data provide the users quality experience within this website. Where applicable, a user will be in charge of allowance of the use of cookies on their computer/device by the means of our cookie control system. This complies with recent legal requirements of obtaining explicit consent from users before storing and/or reading files such as cookies on a user's device.

Users are advised that in order to deny the use and saving of cookies from this website on to their computer's hard drive they should take necessary steps, such as blocking all cookie files from this website in their browser's security settings.

Our websites use tracking software to collect data about how users use our services. This Policy does not cover the use of cookies and other similar technologies by third parties. We may use third-party analytic services to collect Information about use of our websites may contain links leading to other sites. We do not control when or how third parties place cookies on your computer.

## **Why do we process your data?**

- a) To provide you with the services and functionality of the Site;
- b) In case it is set out in the Terms of Use;
- c) When we believe in good faith that such release is appropriate to comply with the applicable law, regulation, legal process or governmental request;

- d) To enforce this Policy and/or the Terms of Use, or any agreement between you and us;
- e) To detect, prevent, or otherwise address fraud, security or technical issues;
- f) To protect against abusive or unlawful use of the Site;
- g) To protect the rights, safety, or property of users, or any other third parties;
- h) In other ways described in this Policy and the Terms of Use;

**Legal basis:**

Art. 6 sec. 1a) GDPR: based on an explicit and voluntary consent, personal data is processed for marketing purposes.

Art. 6 sec. 1b) GDPR: processing is necessary to perform the order or to take action before its implementation.

Art. 6 sec. 1c) GDPR: processing is necessary to fulfil legal obligations.

Art. 6 sec. 1f) GDPR: processing is necessary for purposes resulting from the legitimate interest of data analysis in order to match the offer.

Art. 6 sec. 1f) GDPR: processing is necessary for purposes: resulting from display of the website on the user's device, adapt the content of website to user preferences and its continuous optimization, including the use of Google Analytics, as well as ensuring the continuity of the user's session.

**Duration of Retaining of the Information**

We will keep your Information for as long as you are a user and, thereafter, for no longer than is reasonably necessary for reporting and reconciliation purposes pursuant to legal requirements.

**Marketing purposes (Newsletter)**

We use your personal information for marketing purposes. We will send you messages containing information about available offers, promotions, events, competitions and bonuses. At any time you can object to us using your personal data for marketing purposes, which will make us stop sending our Newsletter. Subscription to the Newsletter is voluntary. Failure to provide your email address will prevent us from providing you with information about our current offers.

**Profiling**

In relation to the Service, we may carry out profiling using your personal data. This profiling may be done on the basis of your past activities. It involves displaying personalised advertising or automatically assessing which services services you may be interested in and to provide you with a

tailored offer. The profiling that we perform does not result in decisions that have You are not affected in any way that produces legal effects or similarly significantly affects you.

### **Your entitlements**

In consequence of processing your personal data by us, you can exercise your rights: access to your data, possibility of correcting them, deleting them and also limitation of their processing.

If we ask you to consent to the processing of your personal data, you will always be able to withdraw your consent (as easily as you gave it. Withdrawing your consent will not affect the lawfulness of the processing we did on the basis of your consent before you withdrew it.

You also have the right to lodge a complaint with the data protection supervisory authority.

### **Third parties**

We pass on your data to other parties if this is necessary to provide a service or enable you to take part in organised campaigns, is required by law or is justified by operational needs (e.g. hosting). This means that we may transfer your personal data to:

- employees/contractors of us and other group companies,
- our customers,
- courier companies,
- banks and payment service providers,
- our other subcontractors, if we have commissioned them to carry out activities involving the processing of your data (such entities will act exclusively on the basis of the contract between us),
- to authorised bodies if we are required to do so by law.

In the event that we, a line of our business, or substantially all our assets are transferred, sold or merged with another business, Information may be one of the transferred assets.

### **Transfers of data outside the European Economic Area**

We only pass your data for the purpose of delivering the campaigns you wish to participate in. Your data may be transferred to a Non-EEA Advertiser if you are taking part in a campaign outside the EEA.

As we operate globally, it is sometimes the case that our providers of ongoing services, (essential to our operations and technology) such as e.g. server support, hosting, project management platform, software, accounting systems etc. are located outside the EEA and we also transfer your data to them.

All data transfers outside the EEA are made on the basis of so-called standard contractual clauses, adopted by the European Commission and providing an appropriate level of safeguards in accordance with the applicable legislation.

### **Complaints about data processing**

If you have concerns about the processing of personal data through this website, please do not hesitate to bring them to our attention.

Contact us: [dataprotection@hashup.it](mailto:dataprotection@hashup.it)

### **Collection and use of technical data (specifications)**

We may automatically collect non-personal information such as the type of Internet browser you are using or the website through which you linked to our site. You cannot be identified by this information and it is used solely for the purpose of providing an effective service on this website.

### **Amendments to the Privacy Policy**

From time to time, we may make changes to this Privacy Policy. If we make any material changes to this Privacy Policy and the way in which we use your personal information, we will post those changes on this page without prior notice. Please check our Privacy Policy on a regular basis.