

Privacy Policy

This page is used to inform website visitors regarding our policies with the collection, use, maintenance and disclosure of information collected from users (each, a "User") of the thinklst.pro website ("Site"). This privacy policy applies to the Site of Thinklst.

Terms used in the Privacy Policy.

Think1st / Controller / we - Think1st Sp. z o. o. with its registered office in Wrocław, at 4 Zdrojowa Street, 52-213 Wrocław, Poland, email: office@think1st.pro.

User – any natural person visiting the Website or using one or more services or functionalities made available on the Website.

Personal data – all information that we process related to you. For example: name, surname and last name, email address, payment details etc.

GDPR – General Data Protection Regulation 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.

Processing – all operations that we perform on your personal data. This includes e.g.: collecting, storage, updating, sending correspondence, analyzing in order to issue an invoice, and erasure.

Cookies – IT data, in particular text files, which are stored on the Website User's end device and are intended for using the Website's pages.

Policy – this Privacy Policy.

Website / Site – the Website run by the Controller at www.thinklst.pro.

Tax ID (NIP): **PL8992830392**National Court ID (KRS): **0000699601**National Business ID (REGON): **368529959**



Responsible party for data processing

The Controller of your personal data is Think1st Sp. z o.o. with its registered office in Wrocław, at 4 Zdrojowa Street, 52-213 Wrocław, Poland. Contact with the Controller is possible in writing to the address indicated above, or via the e-mail address: office@think1st.pro.

Data that we process

Personal data – We may collect your personal data in a variety of ways, including, but not limited to, when you visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. You may be asked for, as appropriate, name, email address, mailing address. You may, however, visit our Site anonymously. Your submission of personal data is voluntary, but sometimes it may be necessary for purposes related to our cooperation, e.g. in order to conclude or execute the contract or to respond to your query or to conduct further correspondence.

Non-personal data – We may collect your non-personal data about whenever you interact with our Site. Non-personal data information may include the browser name, the type of computer and technical information about your means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

Cookies – The Site does not collect automatically any information about you, except for the information contained in Cookies. The Website uses two types of cookies: "session" cookies and "persistent" cookies. Session cookies are temporary files that are stored on the your end device until you log out, leaving the Website or turning off the software (web browser). Persistent cookies are stored on your end device for the time specified in the cookie file parameters or until you delete them.



Purposes and legal grounds for processing data

We process your data when you use our Website

- a. **for analytical and statistical purposes.** The legal basis is our legal interest in measuring the effectiveness of the Website and improving its overall functionality (Art. 6 (1)(f) GDPR).
- b. to diagnose problems related to the operation of the Website, ensuring its correct configuration and IT security. The legal basis for such processing will be our legitimate interest (Art. 6(1)(f) GDPR).
- c. **to respond to your inquiries sent via our contact form.** The processing of your data for contact form purposes is based on Art. 6 (1)(b) of the GDPR.
- d. **for recruiting purposes.** Legal bases for such processing include the provisions of the labor law (Art. 6 (1)(c) GDPR) and a freely given consent (Art. 6 (1)(a) GDPR).
- e. in order to promote the services already provided to you or to the entity that you work for / which you represent. If you give us specific consent, we may process your image (photo provided by you or via public websites e.g. LinkedIn) by publishing it on our website or in our social media along with your first name and last name, name of work place and sometimes your work position and description of such services or cooperation (case studies, testimonials etc.). The legal basis for processing the above data is your consent (Art. 6(1)(a) GDPR).
- f. **for the proper performance of a contract.** Once we have concluded a relevant contract, we may collect information such as data on settlement of any due fees, on how you use our services and on the process of execution of our contract, and also our possible communication. The purpose of processing the abovementioned data and the legal basis as well, is proper **implementation of the agreement** (Art. 6 (1)(b) GDPR)



- and **compliance with a legal obligation to which we are subject to** e.g. tax obligations (Art. 6(1)(c) GDPR).
- g. **to defend against potential claims, as well as for the purpose of potential directing claims.** The legal basis for processing of your personal data will be our legitimate interest (Art. 6(1)(f) GDPR).
- h. to fulfill the legal obligations of the data Controller (e.g. tax, accounting). The legal basis for processing of your personal data will be the necessity for compliance with a legal obligation to which the Controller is subject (Art. 6(1)(c) GDPR).

Retention period

We process personal data only for the time necessary to achieve the purpose(s) for which it was originally collected, after which it will be deleted, except to the extent that it is necessary for us to continue to process it for the purpose of compliance with legal obligations to which we are subject or for another legitimate and lawful purpose.

As a rule, personal data processed on the basis of our legitimate interest are processed until the objection to processing or the fulfilment of the purpose for which it has been processed. If you are not our contractor, we store data gathered only in connection with our current communication, depending on the category of each information – for a period of several weeks (some cookies) to the maximum of 3 years (more specific inquires and conversations, which may be important for our future contact).

Data processed on the basis of the consent are processed until its withdrawal or fulfilling the purpose, for which it has been granted.

Data related to the performance of a contract that we have concluded are stored for the duration of the contract and usually for a period of maximum 7 years after its termination, what results from the tax regulations and limitation period of some claims.



The above periods may be extended, as appropriate, in the event of any possible claims and court proceedings – for the duration of these proceedings and their settlement, and also if we are obliged to further processing of such data to meet legal obligations.

Your rights as the data subject

The right of access – you have the right to obtain from the Controller confirmation as to whether or not personal data concerning you are being processed as well as the right to receive a copy of the personal data undergoing processing (Art. 15 GDPR).

The right to rectification – as the data subject, you have the right to obtain the rectification of inaccurate or incomplete personal data pertaining to you (Art. 16 GDPR).

The right to erasure – you have the right to request the deletion of your data ("the right to be forgotten", Art. 17 GDPR).

The right to restriction of processing – you retain the right to obtain from the Controller temporary or permanent restriction of processing all or selected personal data if one of the cases listed in Art. 18 (1) of the GDPR occur (Art. 18 GDPR).

The right to data portability – you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format as well the right to transmit those data to another controller without hindrance from us (Art. 20 GDPR).

The right to object – you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data (Art. 21 GDPR).



The right to withdraw consent – if we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time, but it won't affect the lawfulness of processing based on consent before its withdrawal.

The right to file a complaint with the relevant supervisory body – you have the right to lodge a complaint with a supervisory authority (in Poland – President of the Polish Personal Data Protection Office), if you consider that processing your personal data does not comply to the statutory regulations and provisions of GDPR.

You can submit a request for the exercise of your rights in electronic form to the following address <u>office@thinklst.pro</u>.

Third parties

ThinkIst may transmit your personal data to third parties, such as internal or external service providers commissioned by ThinkIst to render services on your behalf. Your personal data shall, however, only be transmitted to companies who are obliged to observe data secrecy and who abide by the relevant legislation in the processing of your data. Should such companies be located outside the EU, ThinkIst shall ensure the protection of your personal data in accordance with the relevant legislation by means of the ThinkIst Privacy Policy or other appropriate measures.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.



Contact

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us in writing to 4 Zdrojowa Street, 52-213 Wrocław, Poland, or via the e-mail address: office@thinklst.pro.