

#### Kalimera Entertainment

Ewa Ubysz

Address: Aleja Rzeczypospolitej 33 apt. 58, 02-972 Warsaw, Poland Tax identification number: 951 191 81 52

Tel. +30 6942717440 / +48 608 538 515 e-mail: <a href="mailto:kalimera.24enertainment@gmail.com">kalimera.24enertainment@gmail.com</a>

Legally represented by Mrs. Ewa Ubysz, CEO

# **Privacy Policy**

Kalimera Entertainment Ewa Ubysz with its registered office in Warsaw (hereinafter: "Kalimera Entertainment" or "we")

Data security is one of our priorities. We use effective information technology, physical and organizational security measures to ensure an adequate level of protection while adhering to applicable laws and regulations.

Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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 (the "GDPR") has been in force in the European Economic Area since May 25, 2018. This regulation introduces uniform rules for the protection of personal data throughout the European Union.

"Personal data" means information on an identified or identifiable individual (natural person). We process such data only for purposes associated with our company's business operations. In most cases, the personal data we use is limited to the following: first and last name, e-mail address, phone number, company name and position, company address and (where applicable) other contact details.

Personal data is processed in order to enable or facilitate our business operations and growth. The provision of personal data is voluntary, and our processing practices do not involve any

information pertaining to behaviours or personal life, or any other types of data used for profiling.

## When processing personal data, we follow the main principles of the GDPR:

- Lawfulness: we need to have at least one legal basis to be able to process the data.
- Purpose limitation: we do not use the personal data we have collected for any purposes other than those previously communicated and legally justified.
- Data minimization: we only process data which is necessary to fulfil our objectives; no redundant data is collected.
- Accuracy: we work to ensure that the data we keep is accurate and up to date.
- Storage limitation: we only keep the data for as long as there is a purpose and a legal basis; after that time, the data is erased.
- Integrity and confidentiality: we safeguard the data against unauthorized access, loss
  or destruction by using technical (IT) and organizational measures.
- Transparency: we make our best efforts to communicate with the data subjects in a clear and understandable manner.
- Accountability: our activities are documented so that we can demonstrate (as
  required by the law) that we use adequate personal data protection practices and
  measures and take them into consideration when planning and implementing new
  solutions.

Depending on our objectives, we rely on different legal bases for processing. The most common ones are performance of a contract; data subject's consent; and controller's legitimate interest (e.g. development of service/commercial operations, direct marketing of our services, data archiving, risk management, etc.).

# We mainly use personal data to:

- Maintain and develop business relationships.
- Provide services, sell products and solutions, and identify prospective customers.
- Purchase services, solutions, goods and products.
- Analyse market developments, needs and offerings.
- Pursue marketing and promotional activities.
- Develop competencies and business relationships.

• Organize and attend conferences, training courses, trade shows and exhibitions.

The GDPR grants certain rights to individuals whose personal data is being processed. We are prepared to assist data subjects in exercising these rights upon request.

## Rights of data subjects:

- Right of access: at the request of the interested individual, we will provide
  information as to whether or not we are processing his/her data and, where
  applicable, what categories of data are being processed.
- Right to rectification: we will rectify data without undue delay if it is inaccurate or incomplete.
- Right to withdraw consent: at the request of the data subject, we will stop using the data for the purposes stated in the request.
- Right to erasure (right to be forgotten): we will erase the data when the purpose of processing is no longer valid, or when there is no longer any legal basis for processing.
- Right to restriction of processing: at the request of the data subject, we will restrict
  the processing to storage only until the data is rectified, until legal concerns are
  clarified, or until the objection made by an individual on grounds relating to his/her
  particular situation is resolved.
- Right to data portability: at the request of the data subject, we will provide a copy of the data for transmission to another controller.
- Right to object: any individual may object to the processing of his/her personal data, especially for direct marketing or profiling purposes.
- Right not to be subject to profiling: any individual may refuse to be subject to profiling
  (i.e. making decisions based on automated processing with respect to such individual)
  unless it is required for the execution of a contract.

The above rights can be exercised by submitting a request to: <u>kalimera.24enertainment@gmail.com</u>

While we make every effort to remain compliant, if the manner in which we process personal data is believed to violate the provisions of the GDPR, data subjects have the right to lodge a complaint with the supervisory authority (currently <a href="mainto:uodo.gov.pl">uodo.gov.pl</a>).

## Transferring data to third parties

In the course of our business, we work with entities which use our services, and, on the other side, we use services provided by various individuals and entities. As a result, depending on the situation and context, we may sometimes transfer selected personal data which we control to such parties. This is always done in compliance with the applicable data security, confidentiality and protection principles, and only to the extent permitted by the law.

Depending on the situation and purposes, the personal data that we keep may be received by individuals and entities that collaborate with us, such as our employees and associates, our customers, suppliers, service providers, subcontractors, and postal and courier companies, and our accounting, legal, auditing, consulting and financial service providers.

The GDPR covers the European Economic Area (EEA) and considers the level of personal data protection in the countries covered to be adequate. However, any transfer of personal data to non-EEA countries which are not deemed to provide an adequate level of personal data protection requires additional safeguards. For that reason, whenever it is necessary to transfer personal data to countries outside the EEA, we use legally required solutions to ensure the security of such data.

Personal data will be transferred under agreements the incorporate relevant UE requirements, such as standard contractual clauses approved by the European Commission.

#### Retention of data

Personal data will be kept until consent is withdrawn (if such consent is the only basis for processing) or for the time required to achieve the objectives or fulfil the obligations that arise from contracts or laws and regulations. In addition, personal data may be retained in order to clarify potential disputes (until such disputes are clarified).

# Information obligations

"Controller" means the entity that determines the purposes and means of the processing of personal data. Personal data processing includes all operations performed on such data manually or automatically, such as recording, storage, erasure, alteration, transfer, sharing and elaboration.

The individuals whose data we acquire are notified as soon as possible (and in no event later that within 30 days) of the principles under which Kalimera-Entertainment controls and processes their data by delivering an appropriate information clause by e-mail, by regular mail, in person, by phone or through a website.

The controller of your personal data is Kalimera Entertainment Ewa Ubysz with its registered office in Warsaw at Aleja Rzeczypospolitej 33 apt. 58, 02-972 Warszawa. If you have any questions or comments, please contact us at: kalimera.24entertainment@gmail.com.