

## **Techland Privacy Policy**

This privacy policy explains the rules applicable to the processing of personal data by Techland S.A. with its registered seat in Wrocław, Poland ("**Techland**") in business, commercial and marketing relations and in connection with contacting us, including the relations with Techland's associates, with whom Techland concluded the civil-law agreements ("**Privacy Policy**"). This Privacy Policy explains what Techland is, why and how Techland processes your personal data, and what rights you have in relation to the processing of your personal data by us and how you can contact us.

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#### **I. Glossary – basic concepts.**

personal data – all information that we process related to you. For example: first name, last name, e-mail address, telephone number, information about your professional experience, etc.

processing – all activities performed relating to your personal data. For example: gathering, retaining, updating, sending messages to you, deleting data.

GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council 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).

#### **II. Information about Techland – the data controller**

Techland S.A., a Polish joint-stock company, having its registered office in Wrocław, address: ul. Jana Szczyrki 11, 54-426 Wrocław, Poland, registered in the register of entrepreneurs of the National Court Register maintained by the District Court Wrocław - Fabryczna in Wrocław, VI Economic Division of the National Court Register under KRS number 0000889260, tax identification number (NIP): 6222468959, statistical number (REGON): 251546820, share capital: PLN 17,594,160 paid in full.

#### **III. What personal data do we gather? What is the purpose and legal basis of processing?**

We can process your personal data e.g.:

- when you are our prospective or actual client, supplier or other contractor;
- when you are interested in our activities (e.g. as the media);
- when you are acting on behalf of one of the entities/persons mentioned above, including i.a. when you are their proxy, member of their body, employee or associate.
- when you are our associate.

Therefore, your personal data can be processed in connection with many cases, e.g.:

- when you have provided us with your personal data through various communication channels in order to contact us / obtain specific information from us (e.g. by sending an inquiry / offer via e-mail, telephone or via the form on our websites);
- as part of our cooperation when signing or performing the contract, including when your personal data have been disclosed to us as a contact for the purpose of execution of the contracts and/or for the purpose of concluding them;
- when we have obtained your personal data from other sources (e.g. from the company which you cooperate with and which is our contractor, including from another company from the Techland group, or from publicly available websites).

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The scope of personal data we process depends on the information that is vital for a given relationship – it primarily encompasses the content of documents, as well as of our correspondence/communication, along with other information we have obtained from publicly available professional sources (e.g. industry websites). This data in particular includes:

- identification data, including first name and last name,
- information regarding professional activity, including place of employment, position and/or department;
- data regarding the professional experience, including professional qualifications;
- contact details, including correspondence address, telephone number, e-mail address or other contact information;
- other personal data – to the extent necessary to fulfil our legal duties, e.g. towards ZUS (Social Insurance Agency) or tax duties (Art. 6(1)(c) GDPR);
- communication metadata, including the date of contact and its content.

When Techland is processing your personal data in conjunction with a contract that is being concluded with you, the purpose for the processing of your personal data is the process of seeking to conclude that contract and its performance. **The legal basis** for such processing will then be Art. 6(1)(b) GDPR (it is necessary for the performance of a contract or in order to take steps at the request of the data subject prior to entering into a contract).

If you are contacting us on your own behalf, for example, you have given us your business card with a request to forward particular information, or you have contacted us by using the contact form available on our website to submit an query or an offer, we process your data in order to respond to your query or request and to conduct further correspondence / communication in this matter. **The legal basis** for the processing of your personal data in accordance with this purpose will be our legitimate interest (Art. 6(1)(f) GDPR), i.e. i.a. building relations with the contractor, conducting and maintaining contact with the contractor, aiming to comply with best practices and market standards, as well as building a positive image of Techland.

If you haven't given us your data on your own behalf, for example, you are acting on behalf of our contractor or another entity, we process your data in order to conduct the communication in the context in which you are acting in the name of the third party, as well as for the conclusion and/or processing of a contract with that third party and/or conducting a joint project. **The legal basis** for processing your personal data in accordance with this purpose will be our legitimate interest (Art. 6(1)(f) GDPR) – i.e. i.a. building and maintaining relations with the third party in whose name you are acting, including the conclusion and performance of relevant contracts with that party, aiming to comply with best practices and market standards (e.g. regarding the possibility of including our employees and associates of our partners in the credits of the game), as well as the intention of building a positive image of Techland.

Regardless of the foregoing, your personal data, that is, in particular, your first name and last name, as well as correspondence address and/or e-mail address, can be used by us in order to contact you from time to time (for example, to say thank you, or to send holiday season greetings) or to contact you regarding the promotion of Techland's products. **The legal basis** for processing your personal data in accordance with this purpose will be our legitimate interest (Art. 6(1)(f) GDPR) – i.e. i.a. maintaining relations and building a positive image of Techland and marketing of Techland's products.

Additionally, with regard to the processing of your personal data in order 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); i.e. the protection of the legitimate interests of the controller and the performance of his rights connected with it, including in particular establishing, pursuing, or defending against claims;
- 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).

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When you use our digital resources, e.g. our website, we may process the following data:

- technical information, including the IP address used to connect the computer to the Internet, logging information, the type and version of web browser, time zone settings, types and versions of browser plugins, operating system and platform;
- information about your visit, including full URL, click path to, around and from our website (including time and date), services you browsed or searched for, response times, errors in downloading, duration of visit on some pages, information about interactions on the page (scrolling, clicking, mouse movements), methods used to exit the page, and telephone number used to connect to Techland and/or social media used to make contact with it.

In the event of the foregoing, the purpose for which the data is being processed is the proper management of our digital resources, including our website, the aim to improve its performance, ensure its security, adapt its content to your preferences. In addition, we gather this data for internal purposes, including resolving technical issues, conducting data analyses, testing, as well as for statistical and research purposes. **The legal basis** of our activities is your **consent** (Art. 6(1)(a) GDPR), except for cases when the use of such data is essential for the functioning of our electronic resources, including e.g. website (electronic provision of a service to you within that scope); in such cases **the legal basis** will be our legitimate interest (Art. 6(1)(f) GDPR) – i.e. i.a. ensuring the proper functioning of our electronic resources, including e.g. the website, building a positive image of Techland and promotion of products and services offered by Techland. **Remember that you can always withdraw your consent.** Full information about cookie files can be found at <https://techland.net/docs/privacy-policy>.

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We obtain the above personal data directly from you or from other entities, e.g. from your employers, associates, contractors or from public sources.

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. This means that failure to provide data may constitute grounds for refusal by Techland to enter into cooperation, or for Techland to take legal measures e.g. to terminate a possible contract.

#### IV. Duration of retention of your personal data

We will process your personal data only for such length of time as is necessary for the purposes for which it was initially collected. After that time, it will be deleted or archived, except for cases in which we are obliged to further processing of such data to meet legal obligations. In such a situation, in order to fulfil our legal obligation, we process personal data for a period of time resulting from the relevant legal regulations.

As a rule, personal data:

- collected for the purposes of the conclusion and performance of the contract - will be processed for the duration of the contract and its settlement;
- processed on the basis of our legitimate interest - will be processed until the objection to processing or the fulfilment of the purpose for which it has been processed;
- processed on the basis of your consent - will be processed until its possible withdrawal or fulfilment of the purpose for which it was given;

unless the law (e.g. regarding archiving, taxation, accounting) will oblige us to process such data for a longer period or we will store them in case of any potential claims, for such claim's limitation period specified by law – depending on which of these periods is longer.

The above periods may be extended, as appropriate, in the event of any claims and court proceedings – for the duration of these proceedings and their settlement.

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### **V. Who has access to your personal data?**

Your personal data will only be accessed by duly authorized Techland employees or associates, advisers or auditors, as well as our partners, contractors and subcontractors or providers of solutions / services – to the extent necessary to perform their duties and for the purposes of data processing. All these people have access only to the information they need to perform specific actions.

Therefore, your personal data may be transferred e.g. to entities that help us communicate with our contractors and clients (e.g. they support us in sending e-mails, and in the case of advertising activities - also in marketing campaigns), help us run a website, provide support and operation of our tools and IT systems, as well as – to the extent necessary, to entities that carry out our shipments and other entities with whom we cooperate, including our partners, contractors and other companies from the Techland group.

We are a global company, and for example some of our partners and contractors are operating outside of the European Economic Area (EEA) and in connection with the above your personal data may be transferred there. We provide the appropriate legal mechanisms for the security of your personal data, including standard data protection clauses adopted under the decision of the European Commission and concluding data processing agreements that meet the requirements of the GDPR. In any such case, you have a right to obtain copies of safeguards used by Techland by contacting Techland, for example via e-mail.

Notwithstanding the foregoing, your personal data may be disclosed to a potential seller, buyer or legal successor in the event of sale, purchase or any kind of reorganization of Techland or its assets, subject to the terms of this Privacy Policy (this data will become one of the acquired assets).

Techland may also be required – if there is a legal basis to do so - to provide certain information to public authorities for the purposes of their investigations.

### **VI. What are your rights related to processing of your personal data?**

For the effective exercise of your rights, please send any requests to the e-mail address [gdpr@techland.pl](mailto:gdpr@techland.pl) from the contact address you have provided, along with the title “GDPR Request.”, and in the e-mail, please specify which right(s) it is you wish to invoke. Please note that the instructions given in the preceding sentence are only a recommendation not a requirement. You have the following rights:

1. Access to your personal data – you may ask us at any time to provide detailed information regarding:
  - whether we are processing your personal data;
  - for what purpose;
  - what categories of data we are processing;
  - who is the recipient of your data;
  - what is the planned duration of processing (if possible), and if we are not able to say, the criteria for determining that duration;
  - if the personal data has not been given by you – information about the source of the data.

You can also receive access to all of your personal data that we are processing (data copy).

2. Data rectification – if information about you is or has become inaccurate or incomplete, you have the right to demand that data is rectified or made complete.
3. Revocation of consent – you can revoke your consent to the processing of your personal data at any time (if it was given), without affecting the legality of processing performed prior to such revocation.

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4. Erasure of data – in certain situations, GDPR gives you the “right to be forgotten.” You can invoke this right if we are still processing your personal data, particularly in the following cases:
  - the personal data is no longer vital for the purposes for which it was collected or otherwise processed;
  - you revoke consent to the processing of personal data and there is no other legal basis for continuing to process it;
  - you object to the processing of your personal data when there are no overriding, legitimate grounds for processing;
  - you object to the processing of your personal data for marketing purposes;
  - your data is processed in a manner that violates the law;
  - law requires that we erase your data.
5. Restriction of processing - you can demand that we limit our activities in principle only to storing information about you when:
  - you question the correctness of personal data we are processing – for a period of time that allows us to determine the correctness of that data;
  - the processing of your personal data violates the law, but you prefer that processing be restricted rather than the data be erased;
  - Techland no longer needs your personal data for the purposes of processing, but you need it for establishing, pursuing, or defending legal claims;
  - you have objected to the processing of your personal data – only until such time as it is determined whether your interests take precedence over our legitimate interests.
6. Data portability – you have the right to receive your data in a commonly-used format that can be read by a computer, and also to have your data sent to another data controller, if:
  - processing is done on the basis of your consent or a contract; and
  - processing is done in an automated manner.
7. Objection – you have the right to object to some operations we perform on your personal data for special reasons related to your personal situation, particularly in the following cases:
  - when our processing is based on our legitimate interest;
  - when we process personal data for the purposes of direct marketing, at any time, to the extent that the processing is related to such direct marketing;
  - when we process your personal data for purposes related to scientific or historical studies, or for statistical purposes.

Remember, however, that when in spite of your objection we conclude that there are important, legitimate grounds for processing that override your interests, rights and freedoms, or the basis for establishing, pursuing or defending claims, we will continue to process your personal data encompassed by the objection to the extent necessary. If you disagree with such an assessment of the situation, you can exercise your right to file a complaint with the relevant public authority (more information below).

8. Complaints to the relevant public authority - in connection with our actions as the controller of your personal data, you have the right to file a complaint to the relevant data protection authority. You can find a list of local authorities responsible for data protection across the EU and their contact details at: [https://edpb.europa.eu/about-edpb/board/members\\_pl](https://edpb.europa.eu/about-edpb/board/members_pl).

Of course, if you have any comments about how we do things, we encourage you to contact our Data Protection Officer at [gdpr@techland.pl](mailto:gdpr@techland.pl).

This Privacy Policy may be changed by us from time to time. The current version is available at: [https://techland.net/upload/privacy\\_policy\\_contractors\\_EN.pdf](https://techland.net/upload/privacy_policy_contractors_EN.pdf).

**The Privacy Policy version as of 26 January 2022.**