

# PRIVACY POLICY

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## I. What document are you dealing with?

This Privacy Policy of the Service Provider's Application ("Application") ("Policy") is for informational purposes only, which means that it is not a source of obligations for you (it is not a contract or terms and conditions). The purpose of the Policy is to clearly present the principles of the Application's functioning, as well as the principles of handling personal data and their processing.

## II. Kto jest administratorem twoich danych osobowych?

The controller of your personal data is Allventures Sp. z o.o., with its registered office in Krakow, at Wielicka 42 / B3, 30-552 Krakow, registered in the National Court Register kept by the 11th Commercial Division of the District Court for the city of Krakow under the number 0001034424, Tax Identification Number (NIP): 6793266456, share capital of PLN 5000.

## III. Jak dbamy o twoje dane osobowe?

III. How do we handle your personal data? Data is transferred after connecting the virtual account with your Google or Apple account. Your personal data is processed in accordance with the 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 (Official Journal of the European Union L 119, p. 1) ("GDPR") and other currently applicable personal data protection laws.

Personal data means information about an identified or identifiable natural person ("Personal Data"). An identifiable person is a person who can be directly or indirectly identified, in particular by an identifier such as a name.

## IV. For what purposes and on what basis are your data processed?

Your Personal Data may be processed for various purposes and on various legal bases, depending on the functionalities of the Application you use, in particular for the purpose of providing electronic services available in our Application, conducting marketing activities, market and statistical analysis, improving the quality of services, fulfilling relevant legal obligations incumbent on the Controller, and identifying ad fraud abuses. Your Personal Data provided in connection with the use of the Services in accordance with the Terms and Conditions are or may be processed for the following purposes:

1. Establishing and maintaining an account in the Application, through which you can use the functionalities and services of the Application, e.g., access the history of visited places, taken challenges, and collected points. legal basis: Article 6(1)(b) of the GDPR, i.e., the necessity for the performance of a contract to which you are a party based on our Terms and Conditions, and in the case of promoting our partners, also Article 6(1)(f) of the GDPR, i.e., the legitimate interest of the third party (promotional and informational policy of our partners);
2. Marketing activities of the Controller and partners, e.g., presenting you with advertisements and offers tailored to your interests based on profiling (in a simplified manner, we can analyze your activity or data to better adapt to specific general groups of our users). Legal basis for the above-

mentioned activities: Article 6(1)(f) of the GDPR, i.e., the legitimate interest of the Controller or a third party (Controller's or partners' own marketing);

3. Establishing, exercising, and defending against legal claims that may arise in the relationship between you and the Controller – legal basis: Article 6(1)(f) of the GDPR, i.e., the legitimate interest pursued by the Controller. Providing Personal Data is voluntary and can be done by connecting the Application account with your Apple or Google account, but it may be necessary to.

## V. Who can be the recipient of your data?

Each time, the range of recipients of Personal Data processed by the Controller primarily results from the scope of services you use.

In the processing of Personal Data to a limited extent, entities that technically assist us in efficiently operating the Application may be involved, including those that support us in communication with our users (e.g., support us in sending email messages, and in the case of advertising activities - also in marketing campaigns), hosting service providers or teleinformation service providers, companies that service software, support the Controller in marketing campaigns, as well as legal and advisory service providers.

We also provide you with functionalities enabling you to use the services of our partners (e.g., social media platform providers). If you decide to use such services, the recipients of your Personal Data may also be the mentioned providers, who will process them in accordance with their privacy policies.

## VI. Are your data also transferred to third countries (outside the European Economic Area)?

As part of the Controller's use of tools supporting its ongoing activities, provided, for example, by Google, User's Personal Data may be transferred to a country outside the European Economic Area, in particular to the United States of America (USA) or another country in which the cooperating entity with the Controller maintains tools for processing Personal Data.

In each case of data transfer outside the EEA, we apply the required safeguards, including standard data protection clauses adopted under a decision of the European Commission. Additionally, to protect personal data, both during their transmission and after receipt, we apply generally accepted standards that meet the requirements of the GDPR and the case law of the Court of Justice of the European Union.

The User has the right to obtain a copy of the safeguards applied by the Controller regarding the transfer of Personal Data to a third country by contacting us.

## VII. What rights do you have?

Each Application User has the right at any time to:

1. Lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw).
2. Transfer Personal Data provided to the Controller and processed in an automated manner, based on consent or on the basis of a contract, for example, to another controller.
3. Access Personal Data (including, for example, receiving information about which Personal Data are processed or their copies).
4. Request rectification and restriction of processing (e.g., if the Personal Data is incorrect) or deletion of Personal Data (e.g., if it has been processed unlawfully).

5. Withdraw any consent given to the Controller at any time, where withdrawal of consent does not affect the lawfulness of processing carried out by the Controller before its withdrawal.
6. Object to the processing of Personal Data concerning them, carried out for the purposes of the legitimate interests pursued by the Controller or a third party (unless there are other overriding legitimate grounds for processing in relation to the interests of the user). If Personal Data is processed for direct marketing purposes, the user has the right to object at any time to the processing of their Personal Data for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing – in such a case, Personal Data must no longer be processed for such purposes.

#### VIII. Can this policy be changed and how will you be informed about it?

The Controller may change the Policy in the future. Each time, information about such a change will be provided within the Application. With each change, a new version of the Policy will appear with a new date.

#### IX. From when does this version of the policy apply?

This version of the Policy applies from 01.06.2023.