

(A) Privacy Policy

The following policy has been prepared by VRcadium Sp. z o.o. (in this policy, mentioned also as: VRcadium, we, us) and is intended for entities outside our organization with whom we cooperate, including for: people visiting our website, customers visiting our center based in Krakow at street Grzegórzecka 33/3, participants of our events (hereinafter: "you", "yours"). In section N, there are definitions of terms that will be used in this policy. For the purposes of the privacy policy, it should be assumed that VRcadium is the administrator of personal data. This policy can be changed or updated according to changes in the way personal data is processed or according to changes in applicable law. We encourage you to read it carefully and regularly check the changes that we can make in accordance with the principles of this Policy.

(B) Processing of personal data

Collecting personal data: We may collect data about you such as: name, surname, address, contact details. Below are examples of sources from which we can collect personal data:

- We may obtain your personal data when you provide it to us, for example in a personal interview, by phone, e-mail or other means of communication.
- We can obtain your personal data by entering into business relationships (e.g. if you purchase a product or service from us).
- We may obtain your personal data that you have explicitly made publicly available (e.g., data from your social profile that you have made publicly available).
- We may obtain your personal information when you visit our websites, use the functionality or resources available on our website. When you visit our website, your browser or device may automatically provide certain information (e.g. device type, operating system, browser information, IP address, language settings, time of connection to the website and other technical information), some of this information may be personal data.

Creating personal data: We can also create personal data records about you, e.g. details of your visits to the VRcadium Center.

Personal details of other people, provided by you. In some cases, you can entrust us with the personal details of other people (e.g. when you participate in events, or send us feedback). Every time you entrust us with the personal details of other people, we assume that you have made sure that you have a legitimate interest in providing us with this data and that your conduct is in accordance with applicable law and the provisions of this policy. If this is not the case, please refrain from providing us with other people's personal details.

Categories of personal data: Below are categories of Personal Data that may be processed:

- Personal data: name, surname, gender, photo.
- Payment details: billing address, bank account or credit card number, name of the cardholder, card number, expiry date of the card.



- Contact details: home address, business address, phone number, e-mail address, and information about social profiles
- Professional experience: current and previous positions, details on the scope of responsibilities, information on the industry, and education.
- Views and opinions: Your views and opinions expressed during the completion of surveys, or passed directly to us.
- Participation in events: information on participation in events organized by VRcadium.

Legal basis for the processing of personal data: When processing your personal data in connection with the purposes presented in this Policy, we can rely on one of the following **grounds** (depending on the specific situation):

- We have obtained consent to the processing of your personal data (it concerns only the voluntary processing of personal data).
- The processing of personal data is necessary for the implementation of the contract that you have concluded with us or intend to conclude.
- Data processing is caused by the requirements of the relevant laws.
- Data processing is necessary to protect your interests.
- We have a legitimate interest to promote, manage, conduct operations and promote our business and this interest is not contrary to your interests or fundamental rights.

Processing of sensitive data: We try not to collect or otherwise process your sensitive data, except in situations where:

- Processing is necessary in order to ensure compliance with the law (e.g. diversity reporting).
- Processing is necessary to detect or counteract crimes.
- Processing is necessary for legal defense.
- We have received your explicit consent (as required by law) to process sensitive data.

The purposes we can process your personal data include:

- Providing you services: providing you with our website; providing appropriate information materials; invite to appropriate events and conduct related communication.
- Our website: maintaining and managing our website, providing its content, displaying advertising and other information, communicating and interacting with you through our website.
- Marketing communication: communicating to you by any means (including: e-mail, telephone, message, social media, letter mail, in person) messages and other information that may be of interest to you (in accordance with applicable law).
- Management and maintenance of our IT systems: management of IT systems security, their audit and ensuring security.
- Financial management: sales, finances, corporate audits, supplier management.



- Questionnaires and surveys: engaging you in communicating with us in order to get to know your views and opinions related to our activities.
- Improving our products and services: identifying problems with existing services, planning improvements, creating new services.

(C) Disclosure of personal data to third parties

We may disclose your personal data for a legitimate business purpose (including the provision of services and the provision of services related to the functioning of our website), in accordance with applicable law. In addition, we can provide your personal data:

- Relevant authorities at their request, or in relation to the need to report violations of the law or suspected violations, based on applicable laws.
- Accountants, auditors, lawyers and other entities providing VRcadium consulting services, from whom we require confidence in confidentiality by signing appropriate agreements.
- Processors (e.g., payment service provider) who may be located anywhere in the world. In this case, the requirements set out at the end of this point (C) will be met.
- Relevant parties if this is related to the prevention, investigation, detection of criminal offenses or the execution of penalties for criminal offenses; and to protect public safety.
- Our Website may contain plug-ins or active content of third parties (e.g. Facebook, Twitter, Google+ and LinkedIn). If you want to use third-party plug-ins, your personal data may be transferred to these entities. Make sure you know the privacy policy of these entities in advance.

If we choose to use a third party to process your personal data, this party will be required by contract to: (i) process personal data in accordance with the instructions provided, (ii) use security measures to ensure the confidentiality and security of Personal Data, and other requirements consistent with applicable law.

(D) Data transfer abroad

Customers' personal data is not transferred outside the European Economic Area zone and VRcadium does not plan such activities in the future.

(E) Data Security

We have implemented appropriate technical and organizational measures to protect your personal data against accidental or unlawful: destruction, loss, alteration, unauthorized disclosure, unauthorized access and other unauthorized or unlawful forms of processing; in

accordance with applicable law. It is your responsibility to provide your personal data to us in a secure manner.

(F) Data correctness

We take appropriate steps to ensure that:

- Your personal data is correct, and where it is necessary, we try to ensure that it is up to date.
- Your personal information that is incorrect (taking into account the purpose of its processing) is removed or corrected without undue delay.

From time to time, we may ask you to confirm the correctness of your personal information.

(G) Data minimization

We take all possible steps to ensure that the personal data we process is limited only to the data that we need from the point of view of the purpose of their processing and the purpose of this policy.

(H) Data retention

The criteria we follow when determining how long we will process your personal data are as follows: we will retain a copy of your personal data for as long as it is necessary in connection with the purposes of processing set out in this policy, unless the relevant law requires us longer storage period; we may also store your data for the period necessary to prepare and carry out the actions necessary to defend our legal interests.

(I) Your rights

In connection with the processing of your personal data by us, you have the following rights:

- withdrawal of consent - if the data is processed on the basis of consent,
- access to data - information about what data and for what purpose are processed,
- rectification, modification, updating of data,
- request for deletion of data,
- requests to limit the storage of data,
- raising objections,
- transfer of data,
- lodging a complaint to the supervisory body.

In order to exercise your rights, please contact us at the address indicated in section (M).

(J) Cookies

Cookies are small files that are placed on your devices when you visit websites. They store information about your device, your browser, and in some cases about your habits and browsing history.

Our policy regarding cookies is: http://vrcadium.pl/doc/vrcadium_internet_cookies.pdf

(K) Your responsibilities

We rely on the fact that the Personal Data provided by you is correct, so that we can provide you with appropriate services.

(L) Contact details

If you have any questions or comments regarding any information contained in this Policy, or regarding any aspects of the processing of personal data by VRcadium, please contact: biuro@vrcadium.pl or by post: VRcadium Sp. z o. o., ul. Grzegórzecka 33/3, 31-532 Kraków.

(M) Definitions

- Personal data administrator - an entity that decides how and for what purpose personal data are processed.
- Supervisory authority - an independent public body whose role is to oversee the application of the law related to the protection of personal data.
- Personal data - information about an identified or identifiable physical person. An example of personal data that we can process can be found in section B.
- Processing - all operations on personal data, regardless of whether they are performed in an automated manner or not. Examples are: collection, consolidation, organization, storage, adaptation, change, disclosure, transfer, modification, deletion, merging of data sets.
- Processor - any person or organization that processes Personal Data on behalf of the Administrator.
- Sensitive Personal Data - data revealing racial or ethnic origin, political views, religious or ideological beliefs, trade union membership, genetic data, biometrics, data on health, sexuality or sexual orientation, data on convictions and violations of law or related measures safety.
- Website - the meaning of the term explained in section A.
- Standard Contract Clauses - model contract clauses regarding the transfer of personal data that have been approved by the European Commission.