

## FLOP SYSTEM SP. Z O.O. WEBSITE PRIVACY POLICY

According to Art. 13 of Legislative Decree no. 196/2003 - Code concerning the protection of personal data This Privacy Policy describes the management procedures of **FLOP SYSTEM sp. z o.o.** - in reference to the collection, recording and use of Personal Data of the Users (as defined herebelow).

### 1) Definitions

For the purpose of the present Privacy Policy: "Code" means Legislative Decree no. 196/2003. "**FLOP SYSTEM SP. Z O.O.**" means **FLOP SYSTEM sp. z o.o.** -, a company duly existing and organized under the laws of Poland, with registered office at ul.Kielczowska 64, 51-315 Wrocław . "Personal Data" mean, as specified more fully in Art. 4 of the Code, any information regarding any natural or legal person, bodies, corporation or association, identified or identifiable, even indirectly, by means of reference to any other information, including a personal identification number. "Users" mean those who access this Website and/or who interact with any web services provided by **FLOP SYSTEM SP. Z O.O.** herein. "Website" means this website [www.flopsystem.pl](http://www.flopsystem.pl) This Privacy Policy concerns exclusively this **FLOP SYSTEM SP. Z O.O.**' official Website and no other web site accessed by the User via link or otherwise.

### 2) The information we collect

#### a. Navigation data.

During their normal service, the data communication systems and software procedures utilized to operate this Website may acquire certain information which requires the use of Internet communication protocols. These information are not gathered to be associated with identified subjects, but by nature could, through processing and association with data held by others, make it possible to identify the Users. This class of data includes IP addresses or names in the domains of computers used by Users who connect to the Website, addresses in URI notation (Uniform Resource Identifier) of required resources, the time of application, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the answer given by the server and other parameters associated with the operating system and with the User data communication environment. These details are used solely to obtain anonymous statistical information about the use of the Website and to check that it is working properly. The data might be used to ascertain responsibilities in the event of data communication crimes against our Website, if any.

#### b. Personal Data provided voluntarily by the Users.

In addition, the User may voluntarily give Personal Data, for instance by completing forms asking for certain information or services or by the voluntary forwarding of electronic mail to the addresses provided on this Website. Some of the Personal Data required when completing the forms on the Website may be compulsory, being indispensable for **FLOP SYSTEM SP. Z O.O.** in providing the information or service required by the User. However, the User is always able to distinguish compulsory information from voluntary information, as **FLOP SYSTEM SP. Z O.O.** shall mark the nature of the compulsory information with an asterisk [\*].

#### c. Cookies.

The Website does not use cookies or similar technology with the aim of collecting and/or transmitting Users' Personal Data and no persistent cookies are used of any kind. In fact cookies and other technical information are not used to personalise User access to the Website or to develop the User profile on line. The Website only uses session cookies, which are not stored persistently on the User's computer and vanish when the browser is closed, and cookies that indicate the Website version chosen by the User (i.e.: English, Polish or other languages) to allow correct navigation. Therefore, the use of cookies is limited to the transmission of session Ids, like random numbers, needed to allow and warrant the User efficient navigation of the Website and of its pages.

### 3) Purpose of the treatment and freedom to confer Personal Data.

1. Apart from the specifications for navigation data, the User is free to give the Personal Data for requesting information or to be able to use determinate web services, including the request for particular questions or information about the activities, products and/or services of **FLOP SYSTEM SP. Z O.O.**. The failure to provide information by the User may involve the impossibility to obtain information or services required. As mentioned hereabove, **FLOP SYSTEM SP. Z O.O.** indicates whether the information to be given by the User is compulsory or optional by an asterisk [\*] at the side of information that is indispensable for the service required. Only the failure to provide compulsory information will prevent **FLOP SYSTEM SP. Z O.O.** to provide the requested services.
2. The Personal Data are collected for the following purposes:
  - a. to register those Users needing a password to access any reserved area or services and to verify their identity;
  - b. to contact those User which ask for it;
  - c. to send information and material and/or to provide services requested by any User. Only on specific Users' consent or request, via the on-line registration form, Personal Data may be also used by **FLOP SYSTEM SP. Z O.O.** to send information of commercial nature or about **FLOP SYSTEM SP. Z O.O.**' activities, also by means of newsletters.

### 4) Treatment procedures.

The Personal Data are treated with automated tools for the time strictly necessary to pursue the purposes for which they have been gathered. Specific security measures have been adopted to prevent unlawful or incorrect usage, unauthorised access and the loss of data.

### 5) Personal Data communication.

The Personal Data gathered through the Website may be communicated within the limits of the above-mentioned purposes and for the correct management of the Website to:

- i. persons, companies, associations or professional bureaux that provide services, assistance and advice to **FLOP SYSTEM SP. Z O.O.**, with particular but not solely reference to accounting, legal, tax, financial and data processing matters;
- ii. to subjects to whom the faculty to access to them is acknowledged by law and/or regulations. In addition, the Personal Data will be made known to **FLOP SYSTEM SP. Z O.O.**'s personnel authorised to hold them, who will deal with them in the pursuance of the User's requirements or for correct Website management.

## 6) Care of Personal Data and security.

1. **FLOP SYSTEM SP. Z O.O.** guarantees that processing by electronic tools is carried out, limiting the use of Personal Data to a minimum of the cases where it is strictly necessary, in order to achieve the aims for which they were collected. Though absolute security on the Internet cannot be guaranteed, **FLOP SYSTEM SP. Z O.O.** assures the User that it has adopted an adequate system of technical and organisational safety measures to protect Personal Data against losses, intentional or accidental manipulation and/or unauthorized access. **FLOP SYSTEM SP. Z O.O.** will keep the security system updated in time, in conformity with technological developments.
2. It is the responsibility of each User to guarantee and verify the ownership and custody of their personal password and relative access codes to the web resources.

## 7) Processing controller.

The processing controller of Personal Data is **FLOP SYSTEM sp. z o.o.** -, whose registered office is at ul.Kielczowska 64, 51-315 Wrocław ,Poland. The person in charge of the processing is Mr. Janusz Kopecki **FLOP SYSTEM sp. z o.o.**.

## 8) Rights of the interested party.

The subjects to whom the Personal Data refer (hereinafter "interested party") is entitled to exercise the rights granted by Art. 7 of the Code, entirely report hereunder for reference:

1. The interested party has the right to obtain confirmation of the existence, or not, of personal data that regard him/her, even if not yet registered, and the communication thereof in an intelligible form.
2. The interested party has the right to be informed of:
  - a. the origin of the personal data;
  - b. the purpose and methods of processing;
  - c. the logic applied in case of processing effected with the aid of electronic tools;
  - d. the identity details of the data controller, data processors and representative designated as per Art. 5 clause 2;
  - e. the subjects and categories to which the data may be communicated or which might come to know said data in the role of designated national representative, data processor or person in charge of the processing.
3. The interested party has the right to obtain:
  - a. the updating, correction or, where interested therein, integration of the data;
  - b. the cancellation, transformation to anonymity or blocking of data processed in violation of the law, including that whose conservation is unnecessary in relation to the purpose for which the data have been collected or will be subsequently processed;
  - c. the certification that the operations set out in letters a) and b) above, also as regards their content, have been brought to the notice of those to whom the data was communicated or disseminated, excepting those cases in which this is impossible or would require a manifestly disproportionate use of resources with respect to the right being protected.
4. The interested party has the right to object, in whole or in part, to:
  - a. the processing of personal data that regards him/her, for legitimate motives, even though pertinent to the purpose of their collection;
  - b. the processing of personal data that regards him/her for the purpose of sending advertising materials or direct selling, for carrying out market research or sending commercial messages.

## 9) Changes to our Privacy Policy.

Should **FLOP SYSTEM SP. Z O.O.** decide to change this Privacy Policy, such changes will be published on the Website to allow the User access to the most recent version. **FLOP SYSTEM SP. Z O.O.** asks the User to kindly consult this page regularly.

## 10) Contacts.

If you have any questions or comments about our Privacy Policy, please contact us at the email address [office@flopsystem.pl](mailto:office@flopsystem.pl)