# **Privacy Policy**

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## §1 Personal Data Administrator

- The Administrator of Users' personal data is CUE BALL NETWORK SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw (address: ul. Żurawia 6/12 / 745, 00-503 Warsaw, Poland), hereinafter referred to as the 'Service Provider' or 'Administrator'. This Privacy Policy explains the processing of personal data of Users of the Cue Ball Network application (the 'Application') managed by the Company.
- 2. The Service Provider is committed to protecting the privacy of the Application Users and processes personal data in accordance with applicable laws, including GDPR and the Polish Data Protection Act.
- 3. For matters concerning the processing of personal data, the User may contact the Administrator by e-mail: <u>contact@cueball.network</u> or by post to the registered office address.
- 4. All content and materials created by the Service Provider within the application are the exclusive property of the Service Provider, including any data generated by the system for analytics or service optimisation purposes.

## §2 The scope of personal data collected

- 1. The following personal data of the User are processed in connection with the use of the Application:
  - **Sign-up data**: first name, last name, email address, avatar, acquired in the process of logging in via Google or Facebook.
  - **Technical data**: IP address, device type, operating system, internet browser and activity data in the Application.
- 2. User data is collected directly from the user or, in the case of external logins (OAuth), from Google or Facebook. The service provider does not process or store passwords or other credentials from these platforms.

#### §3 Purposes of personal data collected

The Administrator processes Users' personal data for the following purposes:

- 1. **Provision of the Application services** data processing is necessary to perform the functions of the Application (as described in Terms of Service §5).
- 2. **Communication with the User** to enable contact with the User on matters relating to the Application and to respond to queries.
- 3. **Analytics and service improvement** to provide analysis and statistics on the use of the Application and to improve its features.

- 4. Application protection and abuse prevention to ensure the security of the Application and to protect against breaches.
- 5. **Profiling of personal data** to analyse your activity on the Application and to tailor content to your preferences. Profiling has no legal effect or significant impact on the User.

#### §4 Legal grounds for processing personal data

- 1. The processing of personal data takes place on the basis of Article 6(1)(b) GDPR this is necessary for the performance of the contract for the provision of electronic services.
- 2. The processing of data for analytical and statistical purposes, as well as those related to the security of the Application, is carried out on the basis of the Administrator's legitimate grounds (Article 6(1)(f) GDPR).

## §5 Recipients of personal data

- 1. The Administrator may entrust the processing of personal data to cooperating entities, in particular IT service providers ensuring technological and analytical infrastructure. These entities process data on the basis of a data processing entrustment agreement and are obliged to maintain confidentiality.
- 2. User data may also be made available to state authorities if such an obligation arises from the law.

## §6 Transfers of personal data outside the European Economic Area (EEA)

- 1. In connection with Google or Facebook logins, personal data may be transferred to third countries, in particular to the United States. The Administrator uses standard contractual clauses to ensure an adequate level of protection for this data.
- 2. The Administrator shall ensure that the transfer of data outside the EEA is carried out in accordance with the provisions of GDPR, in particular by applying the standard contractual clauses approved by the European Commission.

## §7 Personal data retention period

- 1. Personal data is stored for the period necessary for the performance of the Application's services, i.e. until the User deletes the account.
- 2. If the User deletes the account, the data is deleted or anonymised, unless further processing is required by applicable law.

#### §8 User rights

In accordance with GDPR, Users have the following rights regarding their personal data:

- 1. **The right of access** the right to be informed about the data being processed and to receive a copy.
- 2. The right to rectification the right to correct inaccurate or incomplete data.
- 3. The right to erasure the right to request the erasure of data in certain cases.
- 4. The right to restrict processing the right to request the restriction of processing in certain situations.
- 5. **The right to data portability** the right to receive your personal data in a format suitable for transfer to another administrator.
- 6. **The right to object** the right to object to the processing of personal data on the basis of the legitimate interest of the Administrator.
- 7. **The right to lodge a complaint** the right to lodge a complaint with the President of the Data Protection Office.

The User can exercise his/her rights by contacting the Administrator at the e-mail address given in §1 point 3.

## §9 Cookies and similar technologies

- 1. The Application uses cookies and other tracking technologies that are necessary for its proper functioning and traffic analysis.
- 2. Cookies may also be used for analytical purposes and to improve the functions of the Application. Details of the rules on the use of cookies are available in the Cookie Policy, which is an integral part of this Privacy Policy.

## §10 Data security

1. The Administrator shall take appropriate technical and organisational measures to protect personal data against unauthorised access, loss or compromise. These measures include data encryption, regular security reviews and restricting access to data to authorised persons only.

## §11 Changes to the Privacy Policy

- 1. The Administrator reserves the right to make changes to the Privacy Policy. Any changes will be published on the Application website and on the Application itself.
- 2. In the event of changes affecting the rights or obligations of the Users, the Administrator will inform the Users by means of an appropriate announcement in the Application.