

## Privacy Policy

This Privacy Policy („Policy”) has been prepared by Bit Peak sp. z o.o. and constitutes the set of principles of your personal data processing by Bit Peak. As data controllers of your personal data we are obliged to protect your privacy and we will process your personal data in line with this Privacy statement and with binding legislation regarding data processing, i.e. 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) („GDPR”), which came into force on May 25, 2018 as well as Polish legislation in this respect.

### 1. Information on data administrator and Data Protection Officer

#### 1.1 Data administrator

The owner of the website and data administrator is Bit Peak sp. z o.o. 2 Opatowska Street, 01-696 Warszawa, REGON: 369663186, NIP: 5252742732, entered under KRS: 0000722498 in the Register of Entrepreneurs by the District Court for the Capital City of Warsaw, XII Economic Division of the National Court Register (“Administrator” or “BitPeak”).

The Administrator can be contacted:

- by mail at Opatowska 2, 01-696 Warsaw, Poland
- electronically at e-mail address [office@bitpeak.com](mailto:office@bitpeak.com)
- by phone +48 22 453 250 842.

### 2. Definitions

- **Personal data means** any information relating to an identified or identifiable natural person (“Data subject”) such as name and surname, identification number, localization, internet identifier, phone number, e-mail address.
- **Special categories of personal data**, called also sensitive personal data, is a subset of personal data and may include the information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Processing of personal data** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 3. The purpose of personal data processing and the time frames of processing

#### 3.1 Recruitment

We process your personal data for the purpose of undertaking the recruitment process. Data in the recruitment process is processed on the basis of your consent, i.e. on the basis of art. 6 section 1 point a) of GDPR. The data gathered in the given recruitment process will be stored for the period of 3 months counted from the end of this recruitment. You may agree for processing your personal data also for the purpose of future recruitment. In such case your data will be stored for the period of 1 year counted from the day of granting such consent.

### **3.2 Concluding and execution of the agreement**

We process your personal data for the purpose of rendering services to you and obtaining the goods and services from you. The data in this process is processed for the purpose of execution of the agreement with BitPeak to which you are the party, i.e. on the basis of art. 6 section 1 point b) of GDPR. The data gathered in this process will be stored for the period of this agreement and for the period of claims prescription deriving from the given agreement. Gathering the data belonging to special category of personal data, we will ask for your clear consent and will inform about the purpose of processing.

### **3.3 Marketing**

We process your personal data for the purpose of marketing activities. We process the data for this purpose on the basis of your consent, i.e. on the basis of art. 6 section 1 point a) of GDPR.

### **3.4 Execution of legal obligations of BitPeak**

We will process your personal data when such processing will be necessary for the execution of legal obligations of BitPeak, i.e. on the basis of art. 6 section 1 point c) of GDPR. Such legal obligations may be obligations deriving from accounting provisions, tax provisions, civil law provisions (for example answering your claim) etc. Data gathered for the above purpose will be stored for the period of execution of the above obligations and for the period during which the legal provisions require to keep it.

### **3.5 Processing necessary for the purposes deriving from legally reasoned interests**

We will process your personal data when such processing will be necessary for the purposes deriving from legally reasoned interests of BitPeak, i.e. on the basis of art. 6 section 1 point f) of GDPR, such as for example: necessity of establishing and defense of our rights or claims assertion from the other party of legal relationship or to undertake day-to-day business activities by BitPeak. The exception are the situations when the interests or elementary rights and freedoms of Data subject are overriding.

The data gathered in this process will be stored for the period of the agreement and for the period of claims prescription deriving from the given agreement.

### **3.6 Preparing databases, record sheets, statistics and analysis**

We will process your personal data for the purpose of preparing databases, record sheets, statistics and analysis for our internal use, i.e. on the basis of art. 6 section 1 point f) of GDPR. The data gathered in this process will be stored for the period of the agreement and for the period of claims prescription deriving from the given agreement.

## **4.1 Cookies**

We use cookies and other similar technologies to recognize you when you visit our Service, remember your preferences, and display relevant, customized content to you. Cookies make your interactions with us faster and more effective. In addition, cookies allow us to present tailored content to the User, without surveys.

The Website uses two types of cookies:

- session cookies - these are temporary files that remain on the User's device until the User leaves the Service or shuts down the web browser. In this case, the information stored in session cookies is automatically deleted.
- permanent (permanent) cookies - these are files that remain on the User's device for the period specified in the parameters of cookies or until they are manually deleted.

All necessary information about cookies you will find on a separate website:

<http://www.allaboutcookies.org/>

Additionally, we invite you to check out our Cookie Policy you can access through link on our site's footer.

#### **4.2 Links on our websites**

Our website may include the links to the websites of third parties. We hereby inform that the terms and conditions of this Privacy statement do not apply to external websites. If you want to find out how the third party protects your personal data, we suggest to obtain its privacy statement personally.

#### **5. How we use your personal data**

Your personal data is gathered and used only in accordance with law and only for the purposes described above. We will not use obtained personal data for the purposes other than stated in this Privacy statement or for the purposes which were revealed to you and for which we received your clear consent.

Your personal data will not be subject to profiling.

#### **6. What happens if you do not give us your personal data**

Giving us your personal data is fully voluntary and not the statutory obligation. However, if you do not agree to us using accessing information provided by you in contact forms, through job application or cookie files, we ask you to not use [www.bitpeak.com](http://www.bitpeak.com) site in the aspects that require providing such data.

#### **7. Disclosure of your personal dataYour data may be shared with third parties:**

- entities cooperating with the administrator in connection with providing commercial information or responding to an enquiry made on the form, including an entity providing professional legal services;
- external entities providing IT support;
- postal or courier operators in relation to the provision of commercial information or a reply to a request made by you on the form;
- entities entitled to obtain them if required by law.

As a rule, your personal data will not be transferred to the countries outside EU/EEA. However, if in the future we would decide for such transfer, we will not do so without your written consent and only following all the conditions stated in GDPR, unless such transfer is allowed or legally necessary in other way.

## 8. Storage and security of personal data

Your personal data is stored in paper or electronic form. We apply the safety means as required by law to protect the personal data that we store from misuse, interference and loss, and unauthorized access, modification or disclosure. BitPeak applies technical security measures such as encryption of hard disks or passwords for accessing the files, access control, two factor verification. Moreover, access to your personal data held in electronic or paper form, will be restricted to persons properly authorized to have access and only to those for which access to the data is necessary through physical security measures such as electronic locks and designated data storage areas.

## 9. Your rights connected with processing of personal data

You have the following rights connected with processing your personal data by us. Their scope and in which situation you may use them is stated in the legal provisions and depends on the legal basis under which we process your personal data:

- right to access your personal data and receiving the copy thereof,
- right to rectification of your personal data,
- right to erasure or restriction of processing of your personal data,
- right to data portability to another data controller,
- right to object to processing your personal data,
- right to withdraw your consent for data processing at any time (without affecting the lawfulness of processing based on consent before its withdrawal).

If you have any questions to this Policy or in order to exercise your rights connected with processing of your data, please contact us using the contact details mentioned at the beginning of this Privacy statement either in writing or electronically. To exercise your rights, provide us with the information about which right you want to exercise and in connection to what data. This will allow us to better fulfill your request.

We will answer your request in the period of one month.

The data subject has the right to lodge a complaint with the supervisory authority - the President of the Office for Personal Data Protection, Stawki 2 Street, 00-193 Warsaw, if you consider that the processing of personal data concerning you violates the provisions of the RODO. More information regarding this right available at: <https://uodo.gov.pl/pl/p/skargi>

## 10. International Data Transfers

As a rule, BitPeak sp. z o.o. does not transfer your personal data outside the European Economic Area (EEA). However, if such transfers are necessary, they will only occur under specific conditions ensuring that your personal data is protected according to the highest standards. The mechanisms and safeguards we use for such transfers include:

### 10.1 Standard Contractual Clauses (SCCs)

We may transfer your personal data to countries outside the EEA using Standard Contractual Clauses approved by the European Commission. These clauses provide appropriate safeguards and ensure that your data is protected in a manner that meets EU standards. The SCCs impose specific obligations on the data importer to ensure the data remains protected.

### **10.2 Transparent Information**

We will keep you informed about any transfer of your personal data outside the EEA, including the countries to which your data is transferred and the specific safeguards used to protect it.

### **10.3 Rights and Remedies**

You have the right to request detailed information about the mechanisms we use for international data transfers and to obtain copies of the relevant safeguards. Additionally, if you believe your data has been transferred in violation of your rights, you have the right to lodge a complaint with a supervisory authority.

For further information or to exercise your rights, please contact us using the contact details provided at the beginning of this Privacy Policy.

### **11. Policy review**

This Policy will be reviewed periodically and updated as necessary to ensure ongoing compliance with legal requirements.

This Policy was last updated on July 26, 2024.