

## PRIVACY POLICY

Dear Sir/Madam,

CITY DRIVE POLSKA limited liability partnership would like to inform you about how we process your personal data as users of our website. In this Privacy Policy, we explain what personal data we collect, use, and disclose.

Personal data refers to any information related to an identified or identifiable natural person, whose identity can be directly or indirectly determined based on such information. Personal data may include information such as names, contact details, identification data (online), online identifiers, or other characteristics specific to an individual.

This Privacy Policy applies when you visit our website. We guarantee the confidentiality of all personal data provided to us by you and ensure the implementation of all necessary security measures and data protection required by data protection regulations. Personal data is collected with due care and adequately protected against unauthorized access.

Considering the above, in accordance with Article 13(1) and (2) of the General Data Protection Regulation (GDPR) (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) and the Act of 10 May 2018 on the protection of personal data, we hereby inform you that:

1. The administrator of your personal data is CITY DRIVE POLSKA limited liability partnership with its registered office in Wrocław, ul. Generała Józefa Bema 2, 50-265 Wrocław, KRS: 0000922790, NIP: 8982269379, REGON: 52000420200000.
2. You can contact the Administrator at the following email address: [biuro@city-drive.pl](mailto:biuro@city-drive.pl) or in writing at the address of the Administrator, CITY DRIVE POLSKA limited liability partnership, ul. Generała Józefa Bema 2, 50-265 Wrocław.
3. The type and category of personal data collected by us depend on the relationship between you and us and the service you use. For the purposes mentioned above, we may collect the following personal data:
  - a. Personal information such as first and last name, email address, postal address, and phone number, NIP (Tax Identification Number).
  - b. Employment-related information, such as job title and other employment or education-related information.
  - c. Account authentication data, such as passwords and other security information used for authentication and access.
  - d. Financial information, such as bank account numbers.
4. The website collects information about its users and their behavior in the following ways:

- a. When registering a user by creating an account to use all CityDrive platform features.
  - b. By voluntarily entering information in forms, email messages, and SMS messages.
  - c. Data obtained through the referral system.
  - d. By collecting server logs by the web hosting operator.
  - e. By storing cookies on end-user devices.
5. The personal data collected by us is used for the purpose for which it was provided by you; to a broader extent, it may only be used for purposes defined by law and other legitimate purposes. The provided personal data may be processed for the following purposes and legal bases:
- a. Email correspondence – when contacting us via email, sending a message through the contact form, or SMS, you provide your personal data such as email address, first and last name, phone number, NIP, and other data included in the sent message. Providing the above data is voluntary but necessary for the purpose of contact. The legal basis for processing in this case is Article 6(1)(a) of the GDPR, which is your consent resulting from initiating contact. After the contact is concluded, your data will also be processed for the purpose of correspondence archiving (Article 6(1)(f) of the GDPR).
  - b. Use of cookies on the website – the legal basis for processing is your expressed consent (Article 6(1)(a) of the GDPR).
  - c. For marketing purposes, including sending newsletters – based on the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR).
  - d. Creating records and registers related to the GDPR – the legal basis for processing is Article 6(1)(c) of the GDPR, which is an obligation arising from the law, and Article 6(1)(f) of the GDPR, which is the legitimate interest of the Administrator.
  - e. Managing user accounts and user registration – when creating an account, you provide your data, such as first and last name, and email address. Providing this data is voluntary but necessary to create an account. Your data will be processed in connection with the execution of the contract (Article 6(1)(b) of the GDPR), as well as for archival and statistical purposes (Article 6(1)(f) of the GDPR).
6. Providing personal data is voluntary but necessary for purposes related to contact and the realization of the legitimate interests of the Administrator. If the required data is not provided, contact from our side will not be possible.
7. Personal data will be processed to the extent necessary to fulfill our obligations and for the period necessary to achieve the purposes for which the data was collected and for the period of securing potential claims in accordance with the applicable legal regulations. Personal data will be stored in accordance with our data storage policy and applicable data protection regulations. When your information is no longer needed, we will take all reasonable steps to delete it from our systems and records or to appropriately anonymize it to prevent your identification based on it.

8. To provide you with the best possible services and ensure the development of our business, we may provide certain information to other data recipients. There may also be a specific legal or statutory obligation that, in good faith, requires us to disclose your personal data to external entities. Personal data may be disclosed to other data recipients, such as:
  - a. Entities authorized to obtain personal data based on binding EU law or Polish law, e.g., courts or public administration bodies, state authorities.
  - b. Cooperating entities, subcontractors, or assignees.
  - c. IT service providers and software vendors.
9. All entities to which we entrust the processing of personal data guarantee the implementation of appropriate data protection and security measures required by applicable law.
10. Due to the use of Google and Facebook services, your data may be transferred to the United States of America (USA) and Canada. These entities ensure an adequate level of personal data protection required by European regulations.
11. You have the right to access, rectify, correct, erase, or restrict the processing of your data, the right to object to processing, the right to data portability, and the right to request access to your data, as well as the right to file a complaint with the supervisory authority – the President of the Personal Data Protection Office, if you believe that the processing of your data is not in compliance with the currently applicable data protection regulations. You also have the right to be forgotten if further processing is not provided for by the currently applicable data protection regulations.
12. You also have the right to withdraw your consent at any time if you have provided your personal data on the basis of consent. The withdrawal of consent does not affect the processing of data carried out based on consent before its withdrawal.
13. Your data will not be processed in an automated manner, including profiling as defined in the GDPR. This means that the Administrator will not make automated decisions that affect your rights and freedoms.
14. To ensure your security, the Administrator takes technical and organizational measures appropriate to the level of security risk of the provided services, especially measures to prevent the acquisition and modification of personal data by unauthorized persons.

#### **ATTACHMENT NO. 1 TO THE PRIVACY POLICY: COOKIE POLICY**

This Cookie Policy is an attachment to the Privacy Policy and constitutes an integral part thereof.

1. This website uses cookies.
2. Cookies are short items of text information stored on the device from which you access our website while browsing it.

3. We use cookies to optimize our website and analyze internet traffic. Cookies and similar technologies (collectively referred to as "cookies") are also used to enhance your convenience, such as by customizing the content and functions of the website to your needs and expectations, as well as for statistical purposes.
4. We use cookies for the following purposes: a. Increasing the performance of the website. b. Creating anonymous statistics. c. Assessing user traffic on the website, which helps tailor the content of pages to user expectations. d. Remembering preferred page appearances, such as font size settings.
5. In addition to cookies sent from our server via our website, cookies may also be sent from servers of websites we refer to, such as Facebook and Instagram.
6. Each user can change cookie settings in their web browser, including completely disabling the ability to store them. If you do not disable the option to store cookies from our website, it means you have consented to their storage on your computer or other mobile device.
7. Cookies may be essential for facilitating website browsing and making it more user-friendly. If you choose to reject all cookies, some parts of the website may not display correctly. However, disabling cookies does not prevent you from browsing our website.

## **ATTACHMENT NO. 2 TO THE PRIVACY POLICY – GOOGLE ANALYTICS SERVICE**

This Google Analytics Service is an attachment to the Privacy Policy and constitutes an integral part thereof.

1. This website uses Google Analytics, a service that involves analyzing online services and activities.
2. Details regarding this service can be found by clicking on this link: [Google Analytics Service Details](#)
3. Google Analytics uses cookies that are stored on your computer and allow for the analysis of website usage.
4. You have the option to disable cookie storage through appropriate settings in your browser software. In such a case, there is a possibility that you may not be able to fully utilize all the functions of this website.
5. We use Google Analytics to analyze the usage of this website and enhance it according to your preferences.
6. Information obtained through cookies about your usage of this website is usually transmitted to Google's servers in the USA and stored there.
7. Google ensures that it uses data protection and security mechanisms as stipulated by European regulations. Details regarding data protection by Google can be found at this link: [Google Privacy Policies](#)

### **ATTACHMENT NO. 3 TO THE PRIVACY POLICY – GOOGLE ADS SERVICE**

This Google Ads Service is an attachment to the Privacy Policy and constitutes an integral part thereof.

1. This website uses Google Ads, an online advertising program that allows for sponsored links to be displayed in Google search results or on Google partner websites when searching for specific products, services, or companies.
2. Google Ads uses cookies that are stored on your computer and allow for the analysis of website usage.
3. You have the option to disable cookie storage through appropriate settings in your browser software. In such a case, there is a possibility that you may not be able to fully utilize all the functions of this website.
4. We use Google Ads to analyze the usage of this website and enhance it according to your preferences.
5. Information obtained through cookies about your usage of this website is usually transmitted to Google's servers in the USA and stored there.
6. Google ensures that it uses data protection and security mechanisms as stipulated by European regulations. Details regarding data protection by Google can be found at this link: [Google Privacy Policies](#)
7. The legal basis for processing user data is Art. 6(1)(a) of the GDPR. Users must give their consent for this.

### **ATTACHMENT NO. 4 TO THE PRIVACY POLICY – FACEBOOK PIXEL**

This Facebook Pixel option is Attachment No. 4 to the Privacy Policy and constitutes an integral part thereof.

1. Facebook Pixel is a piece of code placed on the website that functions as an analytical tool. It enables the targeting of Facebook ads to individuals who have visited our website.
2. Information collected from you through the use of Facebook Pixel is anonymous. There is a possibility that it may be linked with other information about you collected within the social media platform, Facebook.
3. In order to conduct effective marketing campaigns and promote our services, we utilize the Facebook Pixel option provided by the social media platform Facebook.
4. The information collected in this manner is most commonly transmitted to Facebook servers in the United States and stored there. However, Facebook Inc. ensures an adequate level of personal data protection in compliance with European regulations.

### **ATTACHMENT NO. 5 TO THE PRIVACY POLICY – NEWSLETTER SERVICE**

This Newsletter Service is Attachment No. 5 to the Privacy Policy and constitutes an integral part thereof.

1. By subscribing to receive the Newsletter, you must provide your email address. This information is necessary for sending the Newsletter. Additionally, we inform you that we consciously select service providers that we use to ensure the highest level of data protection.
2. The newsletter service providers are: a. FreshMail Sp. z o.o. with its registered office in Krakow, al. 29 Listopada 155, 31-406 Krakow. b. Daktela Polska Sp. z o.o. with its registered office in Warsaw, Al. Jerozolimskie 96, 00-807 Warsaw.
3. Your data, such as your name and email, provided in the newsletter subscription form, will be processed for the purpose of sending the newsletter.
4. Providing your data in the newsletter subscription form is voluntary but necessary for sending you the newsletter based on the consent you have provided, as well as for sending you information about marketing our own products or services based on the legitimate interest of the administrator (i.e., Art. 6(1)(f) of the GDPR) and for the purpose of pursuing any claims related to sending the newsletter.
5. We guarantee that your data will be processed until you withdraw your consent, unsubscribe from the newsletter, or object to it.
6. The mechanism for unsubscribing from the newsletter service is not complicated and involves clicking on an active link with the message "Unsubscribe from the newsletter" located at the end of the message.
7. After you exercise this right and unsubscribe from the newsletter, the subscription data will be retained for a period necessary for potential defense against any potential claims. This is dictated by the legitimate interest of the administrator.
8. We may transfer personal data provided during newsletter subscription to the following entities: a. Service responsible for maintaining the IT system and hosting; b. Email service providers; c. Newsletter service providers.
9. Just as in any case when we process your data, you have the right to access your data, receive copies of it, correct it, delete or limit its processing, the right to data portability, the right to object, and the right to withdraw your consent at any time. However, please note that withdrawing consent for data processing will not affect the lawfulness of data processing based on your consent before its withdrawal. You also have the right to lodge a complaint with the President of the Personal Data Protection Office if you believe that the processing of your data violates the law. Your data will not be processed in an automated manner.