

## PRIVACY POLICY

According to art. 13 and 14 of 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 (further referred to as "GDPR"), We are obliged to perform the informational obligation regarding the persons, whose personal data We process. The following information takes into consideration mainly aspects connected to the processing of personal data of Clients, Contractors, Business Partners, Users of the website <https://www.design-provision.com> as well as people making contact for any different reason related to the activity of DESIGN PROVISION Magdalena Kochanowska.

The following document contains the rules of processing Your personal data related to the usage of a website <https://www.design-provision.com> (further referred to as "the Site").

### I. GENERAL INFORMATION

1. The personal data We collect from You, according to GDPR, is administered by Magdalena Kochanowska performing business activities within the company DESIGN NURTURE Magdalena Kochanowska. ul. Zielone Zacisze 3/20, 03-294 Warszawa, NIP 5252042199, REGON 146516466. (further referred to as „the Administrator”).  
In case of any queries regarding this document or Your personal data processing, You can contact the Administrator by post c/o DESIGN NURTURE Magdalena Kochanowska, ul. Zielone Zacisze 3/20, 03-294 Warszawa, or by email [magda@design-nurture.com](mailto:magda@design-nurture.com).

### II. THE BASE RULES

1. The Administrator takes all the precautions for Your personal data to remain confidential and safe, in particular protected from the access of people without authorization.
2. The Administrator processes Your personal data only in the range necessary for the functionality of the Site, cooperation between the Administrator and their Clients and Contractors, and performing other activities described in this document. The Administrator processes Your data only according to effective laws, including GDPR.
3. Sharing of personal data is, in most cases, voluntary. Nevertheless, not sharing certain, specified in Privacy Policy personal data may result in the inability to cooperate or contact the Administrator.

### III. WHAT QUALIFIES AS PERSONAL DATA AND WHAT DOES ITS PROCESSING CONSIST OF?

1. According to GDPR, „personal data” means any information relating to an identified or identifiable natural person.
2. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3. "Processing" 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### IV. PURPOSES OF THE PROCESSING OF PERSONAL DATA

1. Your personal data is or can be processed by the Administrator for the following purposes:

- 1) performance of a contract

Your personal data can be processed, if the processing is necessary for the performance of a contract to which You are a party, up to the settlement of the accounts (art. 6 item 1 lit. b GDPR). When You are a representation (e.g. members of a board, agents) or employees of one side of the contract, which is or will be signed with the Administrator, Your personal data is processed within the legitimate interests of the Administrator (art. 6 item 1 lit. f GDPR]. Sharing Your personal data is voluntary, but necessary for the performance of a contract;

- 2) organisation and execution of research regarding feedback on designed products or services, on contractors' request.

Your personal data can be processed within the projects executed by the Administrator on contractors' request, including research of the market regarding feedback on designed products or services followed by commentary of the results (preparation of the analysis, comparison and research reports). The basis for the processing of personal data, in the situation described above, is Your freely given consent to participate in the research (art. 6 item 1 lit. a GDPR). The collection of the personal data described above constitutes legitimate interests of the Administrator (according to art. 6 item 1 lit. f GDPR), as expressed in organisational activities performed with the purpose of executing research for the business activity;

- 3) correspondence or other forms of communication

Your personal data can be processed by the Administrator for the purpose of contacting You in written form, by phone or other electronic devices, establishing correspondence or communication. The basis of processing data under such circumstances are legitimate interests of the Administrator within current business activities, as well as contact with Clients, Contractors, Business Partners and any other persons contacting the Administrator for any reason (art. 6 item 1 lit. f GDPR). Provided You initiated the contact, Your personal data will be processed under the consent resultant from the initiated contact (art. 6 item 1 lit. a GDPR). Sharing Your personal data is voluntary, but necessary for any correspondence or communication;

- 4) processing of personal data for marketing purposes

Part of the relation between the Administrator and Clients, Contractors and Business Partners is the presentation of a commercial offer of the Administrator. Additionally, the Administrator takes on such marketing strategies as creating and upkeeping of clients' databases, and other forms of promotional activities (such as participating in markets and industry events). Processing of personal data within this range is an expression of legitimate interests of the Administrator (art. 6 item 1 lit. a and f GDPR) and does not require Your agreement;

- 5) management of the Administrator's profile on the LinkedIn social platform

Your personal data can be processed by the Administrator in relation to Your activity on the Administrator's profile on LinkedIn. The usage of LinkedIn buttons is a legitimate interest of the Administrator (according to art. 6 item 1 lit. f GDPR), based on the exchange of information concerning the subject of services and products of the Administrator and the improvement of such.

The provider of the LinkedIn social platform is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. This copartnership processes personal data of users placed in the

European Union, on the territory of the European Economic Area and in Switzerland. Its origins company is LinkedIn Corporation, 1000 W. Maude Avenue Sunnyvale, CA 94085, USA, which processes personal data of the users placed anywhere outside of the countries mentioned above.

When logged in to Your LinkedIn account, LinkedIn can link the user's behaviour while browsing to other additional information.

For a more detailed range of personal data processing, see LinkedIn Privacy Policy available under this link:

[https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy).

6) analysis of data collected automatically while using the Site

Your personal data is processed according to the art. 6 item 1 lit. f GDPR, meaning according to legitimate interests of the Administrator, expressed in the provision of a functional Site and upkeep of statistics of visits. Within the analysis, personal data, which are processed, are the IP number of the device from which You are accessing the Site, and data regarding the activity on the Site. However, the personal data so processed is not stored anywhere nor archived.

7) compliance with obligations, to which the Administrator is subject by law

Your personal data can be processed as compliance with obligations, to which the Administrator is subject by law, in particular with the purpose of sharing Your data for any eventual judicial or administrative procedures, or any other procedure in front of state authorities, as well as compliance with obligations resultant from accounting and tax laws (art. 6 item 1 lit. c GDPR). In such cases, the processing of personal data becomes an obligation resultant from the law.

8) recruitment purposes

When taking part in a recruitment process organised by the Administrator, then, depending on the details of Your given consent, the Administrator processes the data, connected to the recruitment process for a chosen position or to the needs necessary for a realisation of future recruitment processes. Your personal data is processed based on the consent (according to art. 6 item 1 lit. a GDPR). Disagreeing to process Your personal data prevents You from participating in the recruitment process.

9) archival and evidential purposes

Your personal data can be processed with archival and evidential purposes, to secure the information, which can be used to evidence facts, which constitutes a legitimate interest of the Administrator (according to art. 6 item 1 lit. f GDPR). So archived data can be used as a part of eventual clarification, investigation or defence against demands or accusations.

2. Your personal data may also be processed for other purposes, in which case you will each time receive information on this subject, in a manner consistent with the information obligation resulting from the GDPR (Articles 13 and 14 of the GDPR).

## **V. THE TIMESPAN OF THE PROCESSING OF YOUR PERSONAL DATA**

Your personal data will be processed for an established timespan, according to the purpose of its collection:

- 1) personal data processed for the performance of a contract – until the moment of expiry of the demands resultant from a contract, or for a lawfully binding period of mandatory storage of accounting documentation connected to the contract – depending on which of these conditions lasts longer;

- 2) personal data collected for research – data is processed for a timespan of legitimate interests of the Administrator, meaning time, during which said data is necessary for the Administrator to perform organisational activities regarding the execution of the research;
- 3) personal data processed for correspondence or other forms of communication – data is processed for the timespan of sustaining the correspondence and after its end, for the timespan of legitimate interests of the Administrator, but no longer than until a presentation of eventual demands concerning the correspondence;
- 4) personal data processed for marketing purposes – until the end of the performance of specified marketing activities or until Your objection regarding the processing of Your data for marketing purposes - depending on which of these conditions comes first;
- 5) personal data processed for the administration of Facebook and Instagram social platforms – until the following actions are performed by You (i) cancellation of Your liking of the Administrator's profile and (ii) erasure of all Your activities on said profile. The stop to the processing of Your data will also happen in case of erasure of Your or the Administrator's profile from Facebook or Instagram. The performance of the actions described above is not equivalent to the erasure of archived data regarding the platform's activity.
- 6) personal data processed for the administration of LinkedIn social platform – until the erasure of all Your activity on this profile. The stop to the processing of Your data will also happen in case of erasure of Your or the Administrator's profile from LinkedIn. The performance of the actions described above is not equivalent to the erasure of the archived data regarding the platform's activity.
- 7) personal data processed as compliance with obligations to which the Administrator is subject by law – for the timespan of the storage of evidence proving the completion of those duties, but no longer than until the expiry of those duties;
- 8) personal data processed for recruitment – for the timespan of:
  - a) the recruitment for a position described in the announcement and, in case of Your given consent for the processing of personal data for future recruitment processes – no longer than 2 years since Your entry;
  - b) until Your withdrawal of the consent for the processing of personal data for recruitment;
  - c) until expiry of demands concerning the recruitment – regarding candidates, who have completed a job interview, due to the ability to present demands linked to the ongoing recruitment process, the Administrator can store personal data for 3 years, counting from the last day of the recruitment process and informing the candidate of its results (the candidate being denied)
- 9) personal data processed for archival and evidential purposes – until the expiry of any eventual demands or of archiving of documents obliged by the law – depending on which of these conditions last longer.

## **VI. WHAT SOURCES ARE USED TO COLLECT PERSONAL DATA BY THE ADMINISTRATOR?**

1. Personal data in possession of the Administrator come, first and foremost, from You.
2. If the data was not shared by You, it comes from the following:
  - 1) from Clients, Contractors and Business Partners of the Administrator,
  - 2) from other subjects, which will share Your data, for example, in correspondence,
  - 3) from publicly available sources, in particular from data posted on websites, including open-access records, registries, and databases, CEIDG and KRS included.

## **VII. RECIPIENTS OF THE PERSONAL DATA**

1. With the best protection of Your personal data in mind, the Administrator carefully chooses subjects, with whom they cooperate or whose services they use, while processing Your data.
2. The Administrator does not share Your data with any third persons unless it is necessary for the correct processing of the personal data and the Administrator's business activity. The data is or can be shared with the following subjects:
  - 1) authorised employees and coworkers of the Administrator,
  - 2) recipients of the personal data:
    - a) subjects performing postal services in the name of the Administrator,
    - b) banks (for purpose of settling accounts),
    - c) subjects (legal counsellors and advocates) performing legal services in the name of the Administrator,
    - d) subjects, with which the Administrator is obliged to share the personal data by virtue of the common laws.
  - 3) subjects who process the data (according to previously made contracts on the processing of the personal data):
    - a) subjects, who can potentially gain access to Your personal data, while providing electronic post and other electronic means of communication, as well as IT systems, in the name of the Administrator,
    - b) subjects performing human resources, accounting or judicial assessor services in the name of the Administrator,
    - c) subjects performing transport services in the name of the Administrator,
    - d) subjects performing respondents' recruitment services in the name of the Administrator.
3. The Administrator can share Your personal data to the third country only under circumstances of the usage of IT systems provided by subjects located outside of the European Union or European Economic Area, or when it is required by the common laws and regulations of the country or European Union.

## **VIII. RIGHTS REGARDING THE PROCESSING OF YOUR DATA BY THE ADMINISTRATOR**

1. GDPR provides You with the following rights connected to the processing of Your personal data:
  - 1) right to Your access,
  - 2) right to rectification,
  - 3) right to erasure (right to 'be forgotten'),
  - 4) right to restriction of processing,
  - 5) right to data portability,
  - 6) right to object.

2. If the processing of Your data is based on Your consent, You have the right to, at any moment without stating a reason, withdraw the given consent, in any form, but in particular by sending an email to the Administrator of the data. Withdrawal of the consent does not influence the lawfulness of the processing performed before the withdrawal took place.
3. You have also the right to file a complaint to the President of the Personal Data Protection Office if You decide the processing of data by the Administrator violates any law.
4. Not all rights, mentioned in regulation 1, will appertain to You, in all cases of the processing. This depends on the way the data is processed and on the case's legal foundation.
5. The Administrator's decisions can be automated, this includes profiling. However, it will not cause any legal consequences for You nor influence Your situation in any other significant way.

## **IX. FINAL RESOLUTIONS**

1. While using the Site, You are obliged to follow the law, and rules of courtesy, as well as to respect personal data, author's rights and personal interests of third persons.
2. The range of the Administrator's activity can change and with it, accordingly, the Privacy Policy. The Administrator will inform about any such changes on the Site and by completing the informational obligation in an adequate range.