LIFE SPOT PRIVACY POLICY

Keeping your Personal Data confidential is extremely important for us. We would like to inform you how we protect your privacy in connection with the use of the online service available at: www.lifespot.pl ("**Website**") and communication with us.

This privacy policy (hereinafter: the "**Policy**") comprehensively describes the grounds and means of Personal Data processing and your rights related to such processing.

The Policy is addressed to natural persons who:

- contact us in connection with or in order to establish a business relations with the Joint Controllers,
- participate in the competitions we organize,
- visit the Website,
- have given their consent to receive marketing information in electronic form,
- provide their Personal Data on the Website for purposes of maintaining contact with the Personal Data controller, making inquiries, submitting complaints, etc.,

(hereinafter: "**You**").

The Policy concerns Personal Data whose controllers are: Life Spot Management Sp. z o.o. with its registered office in Warsaw at ul. Litewska 1, 00-581 Warszawa and companies related to it by capital and organizationally comprising the Life Spot group, hereinafter referred to jointly as the "**Joint Controllers**".

Under the joint controllership agreement, the Joint Controllers agreed on their respective responsibilities for compliance with the obligations under the GDPR.

The entity responsible for fulfillment of duties to provide the information referred to in Article 13 and 14 of the GDPR is Life Spot Management Sp. z o.o. with its registered office in Warsaw, ul. Litewska 1, 00-581 Warszawa, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Division of the National Court Register, under number KRS 0000888829, share capital: PLN 703,500.00, NIP: 7011025355, REGON 388442208.

With respect to all matters related to processing of your Personal Data please contact the contact point jointly designated by the Joint Controllers by electronic mail at rodo@lifespot.pl or in writing at the address of Life Spot Management Sp. z o.o. indicated above.

In order to speed up the process, with respect to any matters related to your rights to Personal Data protection, we encourage you to contact Life Spot Management Sp. z o.o. directly in the manner indicated above. However, please note that you may exercise your rights against each of the Joint Controllers who will subsequently forward your demand to Life Spot Management Sp. z o.o. for review.

1. Definitions

Whenever this Policy refers to:

1) **Personal Data** – it shall be understood as information relating to an identified or identifiable natural person,

2) **Life Spot** – it shall be understood as the Joint Controllers jointly,

3) **Cookies** – it shall be understood as pieces of IT data which are stored on the end User's device through which it uses the Website, containing information on the User's use of the Website,

4) **Privacy Policy** – it shall be understood as this document, which sets out the principles according to which the User's Personal Data are processed on the Website,

5) **GDPR**– it shall be understood as the 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,

6) **Website** – it shall be understood as the website available at: www.lifespot.pl through which the User can use Services,

7) **Services** – it shall be understood as services provided by Life Spot to the User. Such services will include inter alia: answering the questions asked and conducting direct marketing,

8) **User** – its shall be understood as each person using the Website,

9) **Joint Controllers** – it shall be understood as commercial law companies and other legal persons related by capital or organizationally, conducting business activity under the common brand Life Spot, i.e. Stena sp. z o.o., Life Spot Management sp. z o.o., Aceno sp. z o.o., Samaki sp. z o.o., Moeda sp. z o.o., Soro sp. z o.o., Life Spot Kraków Czerwone Maki sp. z o.o., Life Spot Katowice Graniczna sp. z o.o., Life Spot Gdańsk Twarda sp. z o.o., Life Spot Kraków Lipska sp. z o.o., Faggio sp. z o.o., Life Spot Projekt 10 sp. z o.o., Life Spot Projekt 11 sp. z o.o., Life Spot Projekt 12 sp. z o.o., Life Spot Projekt 13 sp. z o.o.

2. Purposes of Processing

Life Spot processes your data exclusively based on the grounds indicated in Article 6 sec. 1 of the GDPR, i.e.:

1) on the basis of your consent (Article 6 sec. 1 a of the GDPR)

   Life Spot processes your Personal Data for direct electronic or telephone marketing purposes exclusively on the basis of your specific, freely given, informed and prior consent to each of such activities separately. Each consent you have granted may be withdrawn at any time. Please note that the withdrawal of consent is only effective for the future and does not affect the lawfulness of processing based on consent before its withdrawal.

   As part of such activities, we process only necessary Personal Data such as contact details and basic identification data.

2) for the performance of a contract or in order to take steps at your request prior to entering into a contract (Article 6 sec. 1 b of the GDPR)

   Life Spot processes your Personal Data in order to perform Services. Processing of your Personal Data is necessary to take steps necessary to execute and perform reservation, lease and accommodation agreements, as well as to establish and perform business relations. In such cases we will process your Personal Data in connection with the performance or execution of such agreement or in order to take steps at your request prior to entering into an agreement.

3) for the purposes of the legitimate interests pursued by the controller or a third party (Article 6 sec. 1 f of the GDPR)

Processing may be considered necessary to pursue legitimate interests of Life Spot or a third party except where such interests are overridden by your interests or fundamental rights and freedoms. When processing Personal Data on this ground we always try to maintain balance between our legitimate interests and your privacy.

The following are legitimate interests of Life Spot:

1) exercise of claims arising from the conducted activity or defense against claims,
2) profiling for marketing purposes, including profiling using data obtained from Cookies,
3) analyzing User behavior on the Website for statistical purposes, in order to improve the quality of Services and for safety reasons,
4) taking care of the security of IT systems,
5) carrying out analyses of the manners of use of the Website, and the possibilities of making adjustments and improvements,
6) handling inquiries addressed to Life Spot through a contact form,
7) establishing and performing business relations with you,
8) ensuring the possibility of taking part in competitions we organize.

4) for the purpose of complying with legal obligations (Article 6 sec. 1 c of the GDPR)

Processing may be necessary in order to comply with our legal obligations, e.g. the obligation to issue an invoice or other document required by law, or we are directly ordered to do so by law, as well as in the case of processing personal data necessary to respond to a request or inquiry of a public authority.

3. Categories of Personal Data

On the Website and during communication with us we process the following categories of Personal Data:

1) Identification and contact data indicated in the contact form such as name and surname, e-mail address, telephone number and other Personal Data indicated in the inquiry.
2) Personal Data provided during telephone calls and in correspondence – in the event of telephone contact or correspondence through other channels we will process all information, including Personal Data, that you will decide to provide to us during a telephone call or in correspondence.
3) Personal Data voluntarily provided for direct marketing purposes – name and surname and e-mail address if consent is given for electronic marketing, and name and surname and contact number if consent is given for telephone marketing.
4) Data collected automatically – during the use of the Website some Personal Data may be collected by us automatically. This applies in particular to information concerning your activity on

the Website, preferences and manner of use of the Website. Such data is collected by Cookies and similar technologies. Information concerning the manner of use of Cookies on the Website is available [**HERE**]. Please read such information before starting to use the Website.

5) Personal Data necessary to execute a reservation and lease agreement – our Website makes it possible to take steps intended to execute a reservation or lease agreement. To this end we will process Personal Data such as your name, surname, e-mail address and contact number. In order to execute an agreement, we will ask you to provide additional Personal Data. At the latest upon provision and commencement of processing of such data for such purposes we will provide you with additional information on processing of your Personal Data in connection with the execution of a reservation agreement or a lease agreement, as the case may be.

6) Personal data necessary for the establishment and performance of business relations - first and last name, e-mail address, telephone number, business and service address, PESEL number, REGON, NIP, position in the organization and other identification numbers.

7) Personal data processed in connection with participation in competitions organized by us - first name, last name, e-mail address, mailing address, telephone number.

4. Sources of Personal Data

We collect your Personal Data mentioned in point 3 above directly from you. It also applies to data collected automatically which you provide voluntarily upon commencement of the use of the Website.

5. Sharing Personal Data to Third Parties

Your Personal Data may be entrusted to recipients and other third parties for the purposes mentioned in point 2 above to the extent such data is necessary for such entities to perform tasks entrusted by Life Spot, if required by a provision of law or under any other legal basis.
The following may be considered as recipients or other third parties:

a) entities related to Life Spot personally or by capital, Life Spot's subsidiaries or companies comprising the Life Spot group other than the Joint Controllers;

b) entities processing Personal Data on instructions from Life Spot, such as entities providing document archiving services or accounting services;

c) entities supplying and administering IT systems dedicated to marketing activity of Life Spot (e.g. CRM system);

d) suppliers of cloud services.

Such entities do not decide independently on how to process your Personal Data. Personal Data are processed by them only to the extent necessary for conducting activity by Life Spot which has control over the operation of such entities through appropriate contractual provisions protecting your privacy.

Your Personal Data may also be shared with other entities which will control them in their behalf. Such entities will independently decide on processing thereof and determine the purposes of such. This applies in particular to:

a) all national public administrative bodies (e.g. Police), bodies of other EU member states (e.g. authorities appointed to protect personal data in other member states) or courts, if this is required by the applicable national or EU law, or at their request,

b) legal or tax advisors,

c) suppliers of IT systems and hosting services to the extent they do not process Personal Data on our instructions,

d) suppliers of courier or postal services.

6. Transfer of data outside the European Economic Area

Your Personal Data may be transferred to countries outside the European Economic Area ("**EEA**"), which includes EU member states, Island, Liechtenstein and Norway. In such case the transfer of your Personal Data shall be appropriately safeguarded in accordance with the provisions of the GDPR.

Currently, the Joint Controllers may transfer your Personal Data to the USA, as a result of cooperation with Yardi Systems, B.V., the supplier of the CRM software which is used by the Joint Controllers. In this respect, an adequate level of protection was not ensured by the European Commission by way of a decision; nevertheless, in such case Personal Data will be appropriately safeguarded through standard data protection clauses adopted by the European Commission by way of the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

You may also ask for additional information on the transfer of data outside the EEA and obtain a copy of an appropriate safeguard, using your rights specified in point 8.

7. Data Storage Period

Personal Data is only processed for a specified purpose and within the scope necessary to pursue such purpose and for as long as it is necessary to pursue such purpose. If possible, we immediately erase data when such purposes have been achieved. Please find below purposes pursued by Life Spot in processing Personal Data and periods for which Personal Data is processed in connection therewith:

Purpose of processing	Description of purpose processing	Legal basis of processing	Period of processing
User support	Taking steps at your request, including taking steps necessary to execute and perform reservation or lease agreements.	Taking steps necessary to perform an agreement or at the request of the data subject (Article 6 sec. 1 b of the GDPR)	Duration of agreement
Processing of inquiries	Answering inquiries made through a form available on the Website	Legitimate interests of Life Spot (Article 6 sec. 1 f of the GDPR)	Period necessary to give an answer

Exercise or defense against claims	Establishment or exercise by Life Spot of civil law claims in the course of its activity, and defense against such claims	Legitimate interests of Life Spot (Article 6 sec. 1 f of the GDPR)	6 years[1] or 3 years[2]
Electronic and telephone marketing	Direct digital or telephone and text message / e-mail marketing	Voluntary consent (Article 6 sec. 1 a of the GDPR)	Period during which Life Spot processes Personal Data for other purposes or until the withdrawal of consent
Cookies	Ensuring proper and effective operation of the Website, adjusting the offer to the client's profile and preparing statistics on the basis of the collected Personal Data	Legitimate interests of Life Spot (Article 6 sec. 1 f of the GDPR)	"Session" cookies are temporary files stored on the end user's device until the user logs out, leaves the website, or closes the web browser. Persistent cookies are stored on the end user's device for the time specified in cookie parameters cookies or until the user deletes them.
Marketing profiling	Profiling of Users for marketing purposes	Legitimate interests of Life Spot (Article 6 sec. 1 f of the GDPR)	Period during which Life Spot processes Personal Data for other purposes or until an objection is raised
Establishing and performing business relations	Establishing and performing business relations and fulfilling related obligations	Taking steps necessary to perform an agreement or at the request of the data subject (Article 6 sec. 1 b of the GDPR) Fulfilling a legal obligation (Article 6 sec. 1 c of the GDPR)	Period of establishing and performing business relations and period indicated in the relevant regulations; as a rule, 5 years from the end of the calendar year in which, for example, the issuance of an invoice, termination of an agreement, etc. took place.

[1] Limitation period of civil law claims, calculated from the date on which the claim has become due – Article 118 of the Civil Code.

[2] Limitation period of civil law claims related to conducting business activity, calculated from the date on which the claim has become due – Article 118 of the Civil Code.

Organization of competitions	Conducting competitions and awarding prizes	Legitimate interests of Life Spot (Article 6 sec. 1 f of the GDPR)	Period of conducting of given competition

8. **Users' Rights**

In connection with our processing of your Personal Data, you have:

a) the right to request access to data, and in particular to receive a copy thereof,
b) the right to request rectification of data,
c) the right to request erasure of data (right to be forgotten),
d) the right to request restriction of data processing,
e) the right to object to processing,
f) the right to withdraw consent, where the processing is based thereon. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal,
g) the right to Personal Data portability – where processing of Personal Data is based on your consent or when it is necessary to perform an agreement or take steps at your request,
h) the right to lodge a complaint with a supervisory authority in charge of personal data protection, which in Poland is the President of the Personal Data Protection Office, if you consider that processing of your Personal Data infringes the provisions of the GDPR,
i) obtain a copy of a safeguard – it applies to transfer of Personal Data outside the EEA.

You can exercise the above rights by sending a relevant letter to the following address: Life Spot Management Sp. z o.o., ul. Litewska 1, 00-581 Warszawa or sending an e-mail to the following e-mail address: rodo@lifespot.pl.

Nevertheless, requests related to the processing of your Personal Data may be addressed directly to each of the Joint Controllers.

A complaint to the President of the Personal Data Protection Office should be sent to the address of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warszawa. However, if you have any objections to our processing of your Personal Data, please let us know first and we will take all efforts to examine the existing irregularities.

9. Consequences of Failure to Provide Personal Data

Provision of your Personal Data is not mandatory; however, if you do not provide your Personal Data the performance of Services may be significantly impeded or impossible. The consequences depend on the purpose for which we process Personal Data and may lead to:

a) inability to undertake marketing activities with respect to you,
b) inability to contact us using the contact form on the Website,

c) inability to use the Website,

d) inability to take further actions intended to execute a reservation or lease agreement,

e) inability to establish business relations with us,

f) inability to participate in competitions organized by us.

10. Automated Decision-Making, including Profiling

Life Spot can use information on your activity on the Website, including Personal Data, for profiling consisting in automated processing of some Personal Data. Profiling is a process of automated processing of information concerning you, including Personal Data, in order to make sure that products or services offered by Life Spot are best suited to your needs. To this end Life Spot uses data referred to in point 3 above, i.e. both data you provided directly, and data collected via Cookies and data received from external sources. On that basis Life Spot learns your preferences, adjusts its products and services offer thereto and makes decisions to undertake certain marketing activities with respect to you or personalizes marketing notifications, which are sent upon your separate consent. However, as a result of such activities Life Spot does not make decisions which are based exclusively on automatic decision-making, including profiling, and which may produce legal effects concerning you or similarly significantly affect you.

11. Policy Update

The Policy was updated on 29 March 2023 and may be subject to further changes. If required by law, all information concerning future changes or additions to processing of Personal Data described in this Policy, which may affect you, will be provided to you by means of an appropriate form of communication usually used by Life Spot in contacts with you.

12. Arrangements between Joint Controllers

The essence of arrangements between the Joint Controllers is available [**HERE**].