

PRIVACY POLICY

1. This Privacy Policy sets out the rules for data processing personal data obtained through the website www.incana.pl (hereinafter referred to as the "Website").

2. The owner of the website and the data controller at the same time is INCANA SPÓŁKA AKCYJNA with its seat in Ścinawa (59-330), ul. Wincentego Witosa 10, entered into the National Register of Entrepreneurs Court Register kept by the District Court for Wrocław Fabryczna in Wrocław, IX Commercial Division of the National Register Court under the number KRS 0000311708, with share capital PLN 1,097,680, fully paid, NIP: 5472007443, REGON: 072917202, hereinafter referred to as Incana S. A.

3. Personal data collected by Incana S.A. through the Site The website is processed in accordance with the Regulation of the Parliament 2016/679 of the European Parliament and of the Council of 27 April 2016 on protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repeal Directive 95/46 / EC (General Data Protection Regulation), hereinafter referred to as also GDPR.

4. Incana S.A. takes special care to be respected privacy of Users visiting the Website.

§ 2 Type of data processed, purposes and basis legal

1. Incana S.A. collects personal data of natural persons performing legal action not directly related to their activities (consumers), hereinafter referred to as Users.

2. Users' personal data are collected in the case of:

a) registering an account on the Website in order to create an individual account and managing that account. Basis legal: indispensability to perform the contract for the provision of the service Accounts (Article 6 (1) (b) of the GDPR);

b) using the contact form service on the Website in order to perform the contract provided electronically.

Legal basis: necessity to perform the contract for the provision of the contact form service (art.6 par.1 lit.b GDPR);

c) using the contact form service to send a CV to Website in order to perform the contract provided by road electronic and the necessity to take action at the request of the person, to whom the data relate, before concluding the contract. Legal basis: indispensability to perform the contract for the provision of the form service contact to send a CV and the necessity to take action at the request of the data subject before concluding the contract (art. 6 sec. 1 lit. b GDPR), and in relation to data exceeding in addition to the indicated art. 22 (1) § 1 of the Labor Code - consent of the person to whom data concern (Article 6 (1) (a) of the GDPR).

d) use the contact form service for architects on Website in order to perform the contract provided by road electronic. Legal basis: necessity to perform contract for the provision of the contact form service for architects (Article 6 (1) (b) of the GDPR).

3. When registering an account on the Website, the User gives:

a) e-mail address.

4. When registering an account on the Website, the User independently sets an individual password to access his account. The user can change the password at a later time on the terms described in §6.

5. In the case of using the contact form service, the User provides the following data:

a) e-mail address;

b) name and surname.

6. In the case of using the contact form service to sending a CV, the User provides the following data:

a) e-mail address;

b) name and surname.

7. In the case of using the contact form service for architects, the User provides the following data:

a) name and surname;

b) company name;

c) e-mail address;

d) city;

e) telephone number (optional).

8. While using the Website, they may be downloaded additional information, in particular: the IP address assigned to the User's computer or the external IP address of the Internet provider, domain name, browser type, access time, system type operational.

9. Navigational data may also be collected from Users, incl information about links and references in which they decide to click or other activities undertaken on the Website. Basis legal - legitimate interest (Article 6 (1) (f) of the GDPR), consisting in facilitating the use of services provided by the road electronic and improving the functionality of these services.

10 In order to establish, assert and enforce claims, there may be some personal data provided by the User is processed as part of using the functionalities on the Website, such as: name, surname, data on the use of services, if any claims result from the manner in which the User uses the services, other data necessary to prove the existence of the claim, including the sizes the damage suffered. Legal basis - legitimate interest (Article 6 (1) (f) of the GDPR), consisting in determination, investigation and enforcement claims and defense against claims in the proceedings before courts and other state authorities.

11 Transfer of personal data to Incana S.A. is voluntary.

§ 3 Who is the data shared or entrusted to and for how long are kept?

1. The User's personal data is transferred to service providers from which is used by Incana S.A. when running the Website. Suppliers services to which personal data is transferred, depending on

contractual arrangements and circumstances, or are subject to Incana's instructions ARE. as to the purposes and methods of processing these data (entities processors) or independently define the purposes and methods processing (administrators).

a) Processors. Incana S.A. uses suppliers, who process personal data only at the request of Incana S.A. .. These include, inter alia, hosting providers, providing systems for marketing, systems for traffic analysis on Website, systems for analyzing campaign effectiveness marketing;

b) Administrators. Incana S.A. uses vendors who do not they act only on command and set goals and methods themselves use of Users' personal data.

2. Location. Service providers are based in Poland and other countries European Economic Area (EEA).

3. Users' personal data are stored:

a) If the basis for the processing of personal data is consent then the User's personal data are processed by Incana S.A. as long as the consent is not revoked, and after withdrawal of consent for a period of time corresponding to the period limitation of claims that may be raised by Incana S.A. and what they can be raised against him. If a specific provision does not provide otherwise, the limitation period is six years, and for claims for periodic benefits and claims related to driving business activity - three years.

b) Where the basis for data processing is performance of the contract, then the User's personal data is processed by Incana S.A. as long as it is necessary to perform the contract, and thereafter for a period corresponding to the limitation period claims. Unless a specific provision provides otherwise, the time limit the limitation period is six years, and for claims for benefits periodic and business-related claims economic - three years.

4. Navigational data may be used to provide Users of better service, statistical data analysis and adjusting the Website to Users' preferences, as well administering the Website.

5. In the event of a request from Incana S.A. provides personal data authorized state authorities, in particular individuals organizational structure of the Prosecutor's Office, the Police, the President of the Data Protection Office Personal, the President of the Office of Competition and Consumer Protection or President of the Office of Electronic Communications.

§ 4 Cookies mechanism, IP address

1. The website uses small files called cookies.

They are saved by Incana S.A. on the end device of the person visiting the Website, if the Internet browser permits it allows. A cookie usually contains the name of the domain it comes from, your "expiry time" and an individual, randomly selected numer identifying this file. Information collected using files of this type help to adjust the services offered by Incana S.A. products for individual

preferences and real needs of visitors Webpage. They also give the possibility of developing general ones statistics of visits of the presented products on the Website.

2. Incana S.A. uses two types of cookies:

a) Session cookies: after the end of the browser session or the stored information is cleared from memory when the computer is turned off devices. The mechanism of session cookies does not allow downloading any personal information or any confidential information from Users' computers.

b) Persistent cookies: they are stored in the device's memory end User and remain there until they are deleted or termination. The mechanism of persistent cookies does not allow downloading any personal data or any information confidential information from the Users' computer.

3. Incana S.A. uses own cookies for the purpose of:

a) authentication of the User on the Website and ensuring User session on the Website (after logging in), thanks which the User does not have to on every subpage of the Website re-enter login and password;

b) analysis and research as well as audience audit, in particular to creating anonymous statistics that help understand how the way Users use the Website, which is possible improving its structure and content.

4. Incana S.A. uses external cookies for the purpose of:

a) presenting on the information pages of the Website, maps showing the location of the Incana S.A. office, using the website online maps.google.com (cookie administrator external: Google Inc. based in the USA);

b) the presentation of the Reliable Regulations Certificate via www.strawnyregulamin.pl website (cookie administrator external: Rzetelna Grupa sp.z o.o. with its seat in Warsaw).

5. The cookie mechanism is safe for the computers of the Website Users Internet. In particular, it is not possible to get through this way viruses or other unwanted to Users' computers software or malware. Nevertheless, in their Browsers Users have the option to limit or disable cookies' access to computers. If you use this option, the use of the Website will be possible, apart from the functions, which, by their nature, require cookies. 6. Below we show how you can change popular settings web browsers in the use of cookies:

a) Internet Explorer browser;

b) Microsoft EDGE browser;

c) Mozilla Firefox browser;

d) Chrome browser;

e) Safari browser;

f) Opera browser.

7. Incana S.A. may collect Users' IP addresses. The IP address is a number assigned to the computer of the person visiting the Website by internet service provider. The IP number allows you to access the internet. In most cases, it is assigned dynamically to the computer, ie it changes every time you connect to the Internet. The IP address is used by Incana S.A. when diagnosing problems

technical with the server, creating statistical analyzes (eg. determining the regions from which we have the most visits), as information useful in administering and improving the Website Internet, as well as for security and possible purposes identifying server-loading, unwanted automatic devices programs for viewing the content of the Website.

8. The website contains links and references to other websites internet. Incana S.A. not responsible for the rules privacy protection applicable to them.

§ 5 Rights of data subjects

1. The right to withdraw consent - legal basis: art. 7 sec. 3 GDPR.

a) The User has the right to withdraw any consent given by Incana ARE.

b) Withdrawal of consent takes effect from the moment of withdrawal of consent.

c) Withdrawal of consent does not affect the processing carried out by Incana S.A. in accordance with the law before its withdrawal.

d) Withdrawal of consent does not entail any for the User negative consequences, however, may prevent further use of services or functionalities that are permitted by law Incana S.A. can only testify with consent.

2. The right to object to data processing - the basis legal: art. 21 GDPR.

a) The User has the right to object at any time - for reasons related to his special situation – towards processing of his personal data, including profiling, if Incana S.A. processes his data on the basis of a legitimate interest interest, e.g. marketing of Incana S.A. products and services, running statistics on the use of individual Website functionalities Website and facilitating the use of the Website, as well as a satisfaction survey.

b) Opting out of receiving by e-mail marketing messages regarding products or services, will mean the User's objection to the processing of his data personal data, including profiling for these purposes.

c) If the User's objection turns out to be justified and Incana S.A. no will have a different legal basis for data processing personal data, the User's personal data will be deleted, to processing of which the User has objected.

3. The right to delete data ("the right to be forgotten") - legal basis: art. 17 GDPR.

a) The User has the right to request removal of all or some of them personal data.

b) The User has the right to request the deletion of personal data if:

a. personal data are no longer necessary for the purposes for which they were collected or processed;

b. withdrew the specific consent to the extent to which the personal data were processed on the basis of his consent;

c. he objected to the use of his data for purposes marketing;

d. personal data are processed unlawfully;

e. personal data must be deleted in order to comply from a legal obligation under EU law or law Member State to which Incana S.A. is subject to;

f. personal data has been collected in relation to the services offered information society.

c) Despite the request to delete personal data, in connection with with objection or withdrawal of consent, Incana S.A. maybe keep certain personal data to the extent that processing it is necessary for the establishment, exercise or defense of legal claims as also to fulfill the legal obligation processing pursuant to Union or Member State law, to which Incana S.A. is subject. This applies in particular to data personal data including: name, surname, e-mail address, which data are kept for the purpose of handling complaints and claims related to the use of Incana S.A. services

4. The right to limit data processing - legal basis: art. 18 GDPR.

a) The User has the right to request the restriction of its processing personal data. Submitting the request until it is considered prevents the use of certain functionalities or services, the use of which will involve data processing covered by the request. Incana S.A. nor will it send any messages, including marketing.

b) The user has the right to request restriction of the use of data personal in the following cases:

a.when he questions the correctness of his personal data - then Incana S.A. limits their use on time needed to verify the accuracy of the data, no longer however, than for 7 days; b.when data processing is unlawful, and instead deletion of data, the User will request their restriction use;

c. when personal data are no longer necessary for the purposes for which have been collected or used but are needed The User to establish, assert or defend claims;

d. when he objected to the use of his data – then the restriction takes place for the time needed to consider whether due to the special situation - protection of interests and rights and freedoms of the User outweighs the interests he pursues The Administrator, when processing the User's personal data.

5. The right to access data - legal basis: art. 15 GDPR.

a) The User has the right to obtain confirmation from the Administrator whether processes personal data, and if this is the case, the User does right:

a.obtain access to your personal data;

b. obtain information about the purposes of processing, categories processed personal data, about recipients or categories recipients of this data, the planned storage period User's data or the criteria for determining this period (when specification of the planned period of data processing is not

possible), about the rights of the User under GDPR and the right to lodge a complaint with the supervisory authority, about the source of this data, about automated retrieval decisions, including profiling and security used in connection with the transfer of such data outside the Union

European;

c. obtain a copy of your personal data.

6. The right to rectify data - legal basis: art. 16 GDPR. a) The User has the right to request the Administrator immediately rectification of his personal data, which is incorrect. Taking into account the purposes of processing, the User, the data subject has the right to request that incomplete ones be supplemented personal data, including by providing additional statements by sending a request to the e-mail address in accordance with with §7 of the Privacy Policy.

7. The right to data portability - legal basis: art. 20 GDPR.

a) The User has the right to receive his personal data that he provided Administrator, and then send them to another, chosen by yourself, the administrator of personal data. The user also has the right to demand that personal data be sent by the Administrator directly to such an administrator, if technically possible possible. In this case, the Administrator will send personal data User in the form of a file in csv format, which is the widely used, machine-readable and allowing the received data to be sent to another personal data administrator.

8. In the event of the User having the resulting entitlement from the above rights, Incana S.A. complies with the request or refuses it fulfillment immediately, but no later than one month after it receipt. However, if - due to the complexity of the request or the number of requests - Incana S.A. will not be able to fulfill the request within month, it will meet them in the next two months by informing The User within one month of receiving the request - about the intended extension of the deadline and its reasons.

9. The User may submit complaints, inquiries and motions to the Administrator regarding the processing of his personal data and implementation his rights.

10 The user has the right to demand from Incana S.A. hand over a copy standard contractual clauses by directing the inquiry in the manner indicated in §7 of the Privacy Policy.

11 The user has the right to lodge a complaint with the President of the Office Personal Data Protection, in the scope of violation of its rights to protection personal data or other rights granted under the GDPR.

§ 6 Security management - password

1. Incana S.A. provides Users with a secure and encrypted connection when transferring personal data and when logging in to User Accounts on the Website. Incana S.A. uses an SSL certificate issued by one of the world's leading companies in the field of security and encryption of data sent over the Internet.

2. In the event that the User who has an account in the Store has lost the password to access the Website is possible in any way generating a new password. Incana S.A. does not send a reminder

passwords. The password is stored in an encrypted form in the database, in a way that makes it impossible to read. The purpose of generating a new password, enter your e-mail address in the form available at link "Forgot your password" provided next to the login form accounts on the Website. The new password will be automatic sent to the e-mail address provided during registration or saved in the last change of the account profile.

3. Incana S.A. it never sends any correspondence, including correspondence electronic with a request for login details, in particular the access password to the User's account.

§ 7 Changes to the Privacy Policy

1. The Privacy Policy may change, on which Incana S.A. will inform Users 7 days in advance.

2. Please send any questions related to the Privacy Policy to the following address:

incana@incana.pl

3. Date of the last modification: 20.01.2021.