

KLEMENS AI PRIVACY POLICY

(“Privacy Policy”)

General information

The online service available at www.klemens.ai (the “Platform”) is operated by Polisa Online Sp. z o.o. with its registered office in Warsaw, at ul. Domaniewska 42, 02-672 Warsaw, NIP 5252782996, REGON 382762745 (“Polisa Online”, the “Company” or the “Controller”).

Polisa Online is the controller of the personal data of users of the Platform collected through or in connection with the Platform.

We respect your privacy and protect your personal data, i.e. any information that can be used to directly or indirectly identify a specific person. This Privacy Policy will help you understand which of your personal data we collect, why we collect it and what we do with it.

You are not obliged to provide Polisa Online with the personal data we request, however, if you do not do so, we will not be able to create your account on the Platform, provide you with our products or respond to your questions.

Sources of data

We collect personal data from various sources, including:

1. Personal data provided to us directly by you (e.g. by means of the account registration form on the Platform or contact forms). We collect data on how you use our services and products, e.g. information on your transactions on the Platform, the frequency and duration of your activity on the Platform. We also collect personal data provided to us when lodging complaints and completing surveys. In this way, we may obtain your personal data such as first name and surname, gender, address, e-mail address or telephone number. We do not collect sensitive data about you.
2. Personal data that we collect automatically. We also receive and store certain types of personal data each time you contact us online. For example, we use cookies and similar technologies when you access our Platform and other content provided by Polisa Online or on its behalf on other websites. Personal data are also collected when you search, make purchases and communicate with our customer service department. Examples of the types of personal data we collect include: IP address, device identifier, location data, information about the tool you use to connect to our Platform and the connection, such as browser type and version, time zone setting, browser plug-in types and versions, operating system and purchase history. On our Platform we may also use software tools to measure and collect session information, including page response times, download errors, length of visits to certain subpages, page interaction information, and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

Purposes and legal bases for processing

We process your personal data for the following purposes:

- To register your account on the Platform and enable you to place orders on the Platform (to take steps at your request prior to entering into a contract with Polisa Online or where necessary for the performance of a contract already concluded).
- If you purchase our products, to process payments, provide information on order status, delivery, handle inquiries and requests and handle complaints (performance of a contract).
- To respond to inquiries or to contact you and respond to your questions (consent).
- To develop and improve our Platform and its functionalities (legitimate interest).
- To provide information to you and manage your subscription to our newsletter or other means of communication (legitimate interest).
- To understand and identify the interests and needs of our customers in order to improve our Platform, product range, our existing services or develop new products and services (legitimate interest).
- To provide you with personalised communication and targeted advertising and product recommendations on the Platform (legitimate interest).

Polisa Online uses necessary cookies to ensure the proper functioning of the Platform. The use of necessary cookies may involve the processing of your personal data, the legal basis for which is the controller's legitimate interest consisting in operating the website. This does not change the fact that this will only take place if you consent to the use of cookies other than those necessary to provide a service by electronic means, including the installation of cookies by third parties and the transfer to such parties of data collected via these cookies during your first visit to our Platform. You may withdraw your consent at any time to the installation of cookies other than those necessary to provide a service by electronic means, in your web browser settings on the device you use, or from the Platform level in the footer of the page by clicking on the "Manage cookies" link.

We process your personal data for the performance of a contract to which you are or will be a party. For example, we need to process your personal data in order to deliver the products you have ordered. We also process your personal data where we have a legal obligation to do so, in particular obligations arising from tax regulations, the Accounting Act, the Act on Rendering Electronic Services, the Civil Code and anti-money laundering regulations.

Where necessary, we will ask for your consent to the processing of personal data. Once you have given your consent to the processing of your data, you have the right to withdraw your consent at any time.

In some cases, we rely on legitimate interest as the basis for processing your personal data. Legitimate interest may exist, for example, when you register on our Platform and we use the collected personal data to perform data analysis in order to improve our product range or services.

Profiling

Polisa Online uses personal data to create profiles. We create profiles by analysing information on the use of our Platform, searches and purchases, by building segments (creating groups that have certain common features) and placing personal data in one or more segments. We use these segments to personalise the Platform and our communication with you (e.g. by displaying relevant content when you visit our website or in newsletters), as well as to display relevant offers and advertisements on the Platform and via third-party websites.

You may withdraw your consent at any time to prevent your personal data being used in this way, by using the manage cookies section in the Cookie Policy.

For example, we may collect your data from our Platform regarding the content you view and how you interact with it; our advertisements displayed on social media platforms and other publishers' websites; if you have requested to receive e-mails or SMS messages from us, we track whether you open, read or click their content in order to see what interests you and to send you more content that we believe may be relevant to you; based on this profiling information, we may also display advertisements that match your interests.

Recipients of your personal data

For the purposes specified above, we may transfer your data to the following recipients or categories of recipients – external entities:

- Companies that host or operate our online Platform (Wix.com Ltd, Google Ireland Limited).
- Entities to which Polisa Online assigns receivables under concluded factoring agreements or receivables insurance agreements arising from sales agreements.
- The bank in which Polisa Online maintains a bank account, in connection with transferring through it amounts to your account in the event of returns of goods, complaints or overpayments.
- Entities providing document archiving services to Polisa Online.
- Entities providing to Polisa Online services of auditing financial statements, tax, financial, business and legal advisory services, IT services, marketing services.
- Entities to which Polisa Online outsources debt collection activities and legal representatives acting for Polisa Online.
- Entities responsible for delivering cookies and analysing data on the Platform (Google Ireland Limited) – detailed information on this can be found in the Cookie Policy.

These entities, to the extent that they act as processors, have access to the personal data necessary to perform their functions, but may not use them for other purposes. In addition, they must process such personal data in accordance with the agreement concluded with Polisa Online and in compliance with the applicable data protection regulations.

International transfers of personal data

Polisa Online will send personal data collected in the European Economic Area (EEA) to other countries only when such data will be protected in the same way as in the EEA. In such a situation, we will use the following mechanisms for the transfer of personal data:

- Transfer to a non-EEA country whose privacy legislation ensures a level of protection of personal data equivalent to that in the EEA.
 - Conclusion of an agreement with a foreign external entity under which it will be required to protect personal data in accordance with the same standards as in the EEA (standard contractual clauses).
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Data retention periods

We will store your personal data for as long as we need it for the purposes for which it is processed. For example, when you make an online purchase with us, we will store the data related to your purchase so that we can perform the contract concluded, and then we will retain the personal data for a period that allows us to handle or respond to any complaints or queries related to the purchase.

Your data will be stored where this is required by applicable law, for the period specified in those regulations (e.g. storage of invoices for purchases on the Platform).

Your data may also be retained so that we can continue to improve the services you use on the Platform.

We will actively review the personal data we hold and securely delete it or, in some cases, anonymise it when there is no longer any legal or business need to retain it.

Your rights

We respect your rights under the personal data processing regulations. You may exercise these rights at any time by sending an e-mail to: iod@tuf.pl.

- Right to information. You have the right to receive clear, transparent and understandable information about your rights and how we use your personal data. This is why we provide you with this Privacy Policy.
- Right of access and rectification. You have the right at any time to access, rectify or update your personal data.
- Right to data portability. In certain circumstances, your data may be transferred, copied or electronically sent to another entity. This is done at your explicit request.
- Right to be forgotten. In certain circumstances, you have the right to request the deletion of your data. If you wish to delete the personal data we hold, please let us know and we will take appropriate steps to respond to your request in accordance with legal requirements. If the personal data we collect are no longer needed for any purposes and we are not legally obliged to retain them, we will do our utmost to delete, destroy or permanently de-identify them.
- Right to restriction of processing. In certain circumstances, you have the right to restrict the processing of your personal data.

- Right to object. In certain circumstances, you have the right to object to certain types of processing, including processing for direct marketing purposes (i.e. receiving e-mails with notifications from us or being contacted for the purpose of presenting potential purchase opportunities).
- Right to lodge a complaint with a supervisory authority. You have the right to lodge a complaint directly with a supervisory authority regarding the processing of personal data. The supervisory authority in Poland is the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych). Contact details are available at uodo.gov.pl.
- Right to withdraw consent. You have the right to withdraw your consent at any time (although if you do so, this does not mean that everything we have done with your personal data with your consent up to that point is unlawful). You may withdraw your consent to the processing of your personal data at any time by contacting us using the details below.
- We will update this Privacy Policy when necessary due to changes in the law or in the manner and scope in which we process your data.