# 42.DO SERVICE PRIVACY POLICY

The relationship with users is the most important for us. Due to the above, we are obliged to ensure confidentiality and safety of all personal data provided to us, according to the applicable laws. This Privacy Policy specifies how the data of Users of our Service is protected.

## 1. General Information.

1. The Service Operator of 42.do is as follows: "Fortitudo Gankiewicz, Pruszyński, Spółka Jawna", entered into the Register of Entrepreneurs for Kraków – Śródmieście in Kraków, 11th Division of the National Court Register with the following number: 0000704895, with the seat in Kraków: ul. Przemysłowa 12, IV p., 30-701 Kraków
2. The Service ensures that its primary goal is to ensure privacy protection to the Service User at the level that corresponds at least to the standards specified in the applicable laws, in particular in the General Data Protection Regulation (EU 2016/679) of 14 April 2016, hereinafter referred to as "GDPR", the Act of 18 July 2002 on Providing Electronic Services, hereinafter referred to as the "Act on Providing Electronic Services", and the Personal Data Protection Act of 29 August 1997, hereinafter referred to as the "Personal Data Protection Act".
3. The Service reserves that within its scope, there will be links that will make it possible for the Service Users to access other websites directly. The Service has no influence on the privacy policy applicable by the above websites' administrators and will not be responsible for it.
4. The Service specialises in acquiring information about users and their behaviours in the following methods:
   a. Information entered voluntarily into forms.
   b. By storing cookie files in end devices.
   c. By collecting logs from a web server by the hosting operator (Microsoft Azure).

## 2. What information about users is collected by the Service and how is it used.

1. The Service collects information provided voluntarily by a User. The information may be divided into two categories: 1) Information that is required to use the 42.do service, i.e. personal data that needs to be specified in order to provide the service electronically, under Article 18 of the Act on Providing Electronic Services; and 2) Information shared voluntarily in the training form of the service, for marketing and statistic purposes but only when the user decides to specify such information.
   a. The first category includes such data as: registration data, including: name and surname, date of birth, address, email address and other information that the User specifies when signing up to the 42.do service.
2. The Service may also store information about connection parameters (time stamp, IP address, the order of pages visited within the scope of the 42.do service, the length of visits, type and version of the web browser and the operating system used for interacting with the 42.do service).
3. Data in the form is not shared with third parties unless the User grants their consent for doing so.
4. Data specified in the form may be a collection of potential customers, registered by the Service Operator in the register kept by the Department for Personal Data Protection (UODO).
5. Data specified in the form is processed for the purpose resulting from the function of a given form, e.g. in order to complete the process of handling a maintenance submission or a commercial contact.
6. Data specified in forms may be shared with entities that execute some services from the technical point of view – this applies particularly to providing information about the owner of a registered domain to entities being operators of web domains (primarily NASK - the

Scientific and Academic Computer Network), services managing payments or other entities with which the Service Operator cooperates in this scope.

7. Fortitudo hereby informs that as the Administrator of personal data under the GDPR, it may entrust processing of the data collected within the Service to other entities, under Article 6 (paragraph 1 a., f.) of the above Regulation.
8. The User to whom the data applies has the right of accessing the content of their data and to correcting it by contacting: support@42.do

**3. Information about cookie files.**

1. The Service uses cookies.
2. Cookie files are IT data, specifically text files that are stored in the Service User's end device and are intended to simplify use of the Service's pages. Cookies usually contain the name of the website where they originate from as well as the time of their storage on the end device and the unique number.
3. The Service Operator is the entity that uploads the cookies in the Service User's end device as well as one that has access to it.
4. Cookies are used for the following purposes:
   a. Creating statistics that help in understanding how the Service Users use the pages which makes it possible to improve their structure and content;
   b. Retaining the session of the Service User (after logging in) due to which the User does not have to enter the login and password on every page of the Service;
   c. Determining the user profile in order to display customised materials in advertisement networks and especially in Google.
5. Within the Service, there are two types of cookie files used: Session cookies and persistent cookies. Session cookies are temporary files that are stored in the User's end device until logging out, leaving the website or closing the software (web browser). Persistent cookies are stored in the User's end device for a period specified in the cookie file parameters or until they are deleted by the User.
6. The software used for browsing websites (web browser) usually permits storage of cookie files in the User's end device, by default. The Service Users may introduce changes of settings in this regard. The web browser enables to delete cookies. It is also possible to block cookies automatically. Detailed information regarding this can be found in the help section or the documentation of the web browser.
7. The limitations of using cookie files may impact some features available on the Service website.
8. Cookie files stored in the Service User's end device may also be used by advertisers and partners cooperating with the Service Operator.
9. We also recommend to read the privacy policies of those companies, to learn the principles of using cookie files for statistical purposes: Google Analytics Privacy Policy
10. Cookie files may be used by advertising networks, particularly Google, to display advertisements matching the way in which the Users browse the Service. For this purpose, they can store information about the navigation path of the User or when the User remains on a given website.
11. In the scope of information about the preferences of the User collected by the Google advertisement network, the user may browse and edit information resulting from cookie files using the following tool: https://www.google.com/ads/preferences/ .

**4. Server logs.**

1. Information about some behaviours of users are subject to logging in into the server layer. The data is used only for the purpose of managing the service and for ensuring the most effective provision of hosting services.
2. The browsed resources are identified through URL addresses. Furthermore, the following may be stored:
   a. Query receipt time,
   b. Response sending time,

    c.   Name of customer's station – identification executed via HTTP protocol,

    d.   Information about errors that occurred when executing HTTP transactions,
    e.   URL address of a website visited by the User previously (referrer link) – in the case the Service was accessed through a link,
    f.   Information about the User's browser,
    g.   Information about the IP address.
3. The above data will not be associated with particular people browsing the pages.
4. The above data is only used for the purpose of managing the server.
5. Any data above will be collected and protected in the same way regardless of whether the User will use the mobile application or web application.
6. Due to the fact that the Service collects personal data and web server logs by the Digital Ocean hosting operator, in order to find out details of the procedure of collecting and protecting data provided by the Service Users, please refer to the following link: https://www.digitalocean.com/legal/privacy/

**5. Sharing data and its protection**

1. Fortitudo shares personal data with entities in the USA based on an enforcement decision (EU) 2016/1250 (notified as document C(2016) 4176) of the European Commission, in force from 12 July 2016, implementing the EU-US Privacy Shield.
2. Privacy Shield is based on a system of self-certification, within the scope of which organisations in the USA wishing to process personal data of Europeans must be obliged to follow a number of privacy principles specified in the Privacy Shield.
3. The Service collects personal data on the Digital Ocean hosting operator server which holds the Privacy Shield certificate.
4. The data is subject to sharing with third parties only within limits that are permitted by law.
5. Data enabling identification of a natural person is shared only by consent of that person.
6. The Operator may be obliged to provide information collected by the Service to entities authorised on the basis of legal requests, in the scope resulting from such requests.

**6. Managing cookie files – how to grant and revoke a consent in practice?**

1. If a User does not want to receive cookie files, they can change the browser settings. We reserve that deactivating cookie file support required for the process of encryption, safety, retention of user preferences may hinder, or in extreme cases make it impossible to use website.
2. In order to manage cookie settings, select the web browser/system from the list below and follow the instructions:
    a.   Internet Explorer
    b.   Chrome
    c.   Safari
    d.   Firefox
    e.   Opera
    f.   Android
    g.   Safari (iOS)
    h.   Windows Phone
    i.   Blackberry

**6. Deleting data and ceasing its processing**

1. A consent granted by the User for processing personal data may be revoked at any time in any format.
2. The User whose personal data is processed has the right to submit an objection at any time regarding the processing of their data. The objection will be considered by Fortitudo if no legally justified basis for refusing the objection exists. The above decision will in no way

have a character of an arbitrary Fortitudo decision but it will be determined by the legal status applicable at the point of submitting the objection.

3. The User, whose data is processed has the right to submit a request to Fortitudo for removing the said data. The data will be removed immediately if one of the following conditions is met:
   - Personal data is no longer required for the purpose for which it was collected or processed in any other way;
   - A person to whom the data relates cancelled their consent according to which data processing is permitted and there is no other legal base for processing;
   - A person to whom the data relates submits an objection against processing and there are no superior legally justified bases for processing, or a person to whom the data relates submits an objection against processing of their data for the purpose of direct marketing;
   - Personal data was processed against the law;
   - Personal data must be deleted in order to meet the legal obligations provided for in the EU laws or laws of a member state to which Fortitudo is a subject of;

4. A Service User being a consumer has the right to submit a complaint at any time to the Department for Personal Data Protection (UODO) in the case of detecting any non-compliances in the scope of processing personal data.

5. In the case of the User ending a subscription to the 42.do Premium service or suspending it temporarily due to failing to make a timely payment, the User will still be able to use the 42.do service in the free option and their data will be stored according to the same principles as before. In the case of ending a subscription to the 42.do service in the free option, the provided data will be stored by Fortitudo on backup copies for 90 days. After the above period lapses, the data will be removed if the subscription is not renewed.