

# PRIVACY POLICY

Effective date: 01.08.2019

## 1. Introduction

LemonUnit Sp. z o.o Sp. k. having a principal place of business at Siedliska 209a, 36-042 Lubenia, Poland, (hereinafter, referred to as the “Company”, “we”, or “us”) collects from the individual user (hereinafter, referred to as “you” or “your”) certain personal data through the website <http://lemonunit.com/> (hereinafter, referred to as the “Website”). The Company acts as a data controller with regard to your personal data.

This Privacy Policy contains Company’s policies and procedures governing the collection and processing of your personal data through the Website.

## 2. Your consent

By using the Website, you are consenting to processing of your personal data as set forth in this Privacy Policy. The term “**personal data**” refers to any information relating to a natural person who can be identified, directly or indirectly, by using such information, and the term “**processing**” refers to collecting, storing, deleting, using, and disclosing personal data.

In exceptional cases (where required by the applicable law), we will seek your explicit consent. For example, we may seek your explicit prior consent if we intend to (1) use your personal data for the purposes that are not indicated in this Privacy Policy, (2) disclose or transfer your personal data

to third parties that are not indicated in this Privacy Policy, (3) collect any sensitive data from you, or (4) significantly amend this Privacy Policy.

Marketing communication. Please note that direct marketing communication will be delivered to you only after you provide us with your explicit prior consent (e.g., through filing out the “Join our newsletter” form available on the Website). You have the right to opt-out from direct marketing communication (e.g., a newsletter) at any time by clicking on the “unsubscribe” link contained in any of such direct marketing communications sent to you or by contacting us at [contact@lemonunit.com](mailto:contact@lemonunit.com)

### 3. Types of collected personal data

Please note that we comply with data minimization principles. We collect and process only minimal amount of personal data that is necessary for performing the operations requested by you. We do not attempt to collect any personal data from you that are not strictly necessary for performing the requested operations or for pursuing our legitimate business interests.

If you sign up for our newsletter by using the “Join our newsletter” functionality available on the Website, we will collect your email address. Please note that, by filing out the newsletter request form, you provide us with your explicit consent to deliver you our newsletter and any other direct marketing communication.

If you fill out one of the contact forms available on the Website, we may collect the following personal data from you:

- Your company name;
- Your full name;
- Your email address;
- Your phone number or telegram username;
- Your Skype ID;
- Your business project name; and
- Any other information that you may decide to provide us.

When you visit the Website, we may collect your IP address.

**Sensitive data.** Unless otherwise stated in this Privacy Policy, we do not collect, any sensitive data from you, such as your health information, opinion about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about your sexual orientation.

#### 4. The purpose of collection of personal data

We respect data protection principles and use your personal data only for (1) replying to your enquiries and (2) improving our business. The legal grounds for processing of your personal data are (1) ensuring the performance of a contract and (2) pursuing our legitimate business interests.

The personal data provided by you for subscription of our newsletter will be used for delivering our newsletter and providing you with advertisements of products and services, which may be of interest to you.

The personal data provided by you through one of the contact forms available on the Website will be used for providing you with the requested information and performing other operations explicitly requested by you.

The IP address will be used only for website analytics purposes.

#### 5. Non-personal data collected by us

We may collect non-personal website analytics data, such as browser types, operating systems, and the URL addresses of websites clicked to and from the Website, in order to analyze what kind of users visit the Website, how they find it, how long they stay, from which other websites they come to the Website, what pages they look at, to which other websites they go from the Website.

**Aggregated data.** In case your non-personal data is combined with certain elements of your personal data in a way that allows us to identify you, we will treat such aggregated data as personal data.

#### 6. Use of personal data for human resources (HR) management

If you apply to work with us, we will request you to provide us with your personal data that will enable us to create and manage your HR profile, assess your suitability for the respective position, and allow us to comply with the necessary administrative and legal obligations. The use of your

personal data for HR management purposes is subject to this Privacy Policy and other agreements concluded between you and us.

**Types of personal data.** We may collect your full name, address, email address, social security number, a copy of your ID card, your bank details, and other information that may be necessary for contractual purposes or required by the applicable law.

**Sensitive data.** If necessary, we may need to ask you to provide us with some of your sensitive data (e.g., health information, biometric data and membership of a professional or trade association). Please note that we will collect such sensitive data only if such data is strictly necessary for pursuing our legitimate interests and only after you provide us with your explicit consent.

**Purposes of personal data.** We will collect and process your personal data for legitimate HR purposes only, such as facilitating employment or other contractual relationships. We may also use your personal data to pursue our legitimate business interests, such as to prevent fraud, administrative purposes, or reporting potential crimes. We will not use your personal data for the purposes that are overridden by your own interests.

**Disclosure and transfer of personal data.** We may disclose your personal data to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you. For example, we may need to pass on certain personal data to our payment provider to pay you for the provided services. If necessary, we may transfer your personal data

to other group companies. Please note that some third parties may be located outside the jurisdiction in which you reside. Also, if you are a resident of the EEA, your personal data may be transferred to an entity located outside the EEA. We will transfer your personal data outside the EEA only if we can ensure an adequate level of protection that is consistent with this Privacy Policy.

**Security measures.** Your personal data is subject to the security measures described in Section 7 of this Privacy Policy.

**Your rights regarding your personal data.** You can exercise your rights regarding your personal data, such as accessing, amending, and deleting your personal data, by following the instructions described in Section 9 of this Privacy Policy.

**Retention period.** Your personal data will be stored by us only as long as it is necessary for HR management purposes or as long as it is required by the applicable law. As soon as your personal data is no longer necessary, we will immediately delete it.

#### 7. Protection of personal data

We deploy information security tools and organizational measures, including, but not limited to, secured networks, encryption, and limited access to personal data by our staff, to protect your personal data. We put reasonable efforts to maintain the security of and to prevent misuse, loss, unauthorized access, and modification of your personal data. However, please note that, due to the inherent risks of using the Internet, we cannot

be liable for any destruction, loss, leakage, and falsification of personal data caused by circumstances beyond our reasonable control.

In case a personal data breach occurs, we will inform the relevant data protection authority without undue delay and immediately take reasonable measures to mitigate the breach, as stipulated in the applicable law.

Please note that you are solely responsible for browsing on the Website and communicating with us by using a secure Internet connection.

#### 8. Third party access to your personal data

Your personal data may be accessed by third parties that perform services on our behalf (e.g., our hosting provider Nexcess and our newsletter provider MailChimp). We will assure that such third parties guarantee an adequate level of protection for your personal data that is consistent with this Privacy Policy.

We do not sell your personal data to third parties, and does not intend to do so in the future.

In some cases, when required by the applicable law, we will respond to requests from public authorities to disclose information about the users of the Website to the extent necessary for pursuing public interest objectives, such as national security or law enforcement.

In case the Company is being sold partly or fully, the Company may also provide your personal data to a purchaser or successor entity.

With the exceptions stated in this Section 8, we do not disclose or transfer your personal data to third parties.

**Transfer of personal data outside the EEA.** If you are a resident of the European Economic Area (EEA), please note that some of third party service providers with whom we cooperate may be located outside the EEA. Thus, we may need to transfer your personal data outside the EEA. If such a transfer occurs, we will ensure that the third party that receives your personal data can guarantee an adequate level of protection of your personal data that is consistent with this Privacy Policy.

#### 9. Your rights regarding your personal data

We provide you with the possibility to exercise the following rights regarding your personal data:

- Get a copy of your personal data that we store;
- Move your personal data to another processor;
- Delete your personal data from our systems;
- Object and restrict processing of your personal data;
- Withdraw your consent; or
- Process your complaint.

If you would like to exercise your rights listed above, please send an email to the following email address: [contact@lemonunit.com.io](mailto:contact@lemonunit.com.io). We will answer your request as soon as possible but no later than within 2 weeks.

**Launching a complaint.** If you would like to launch a complaint about the way in which your personal data is handled by us, we kindly ask you to contact us first. After you contact us, we will investigate your complaint and provide you with our response as soon as possible. If you are a resident of the EU and you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

**Children's privacy.** The Website should not be accessed by persons under the age of 18. If a person under the age of 18 has provided us with personal data without obtaining parental or guardian consent in advance, the parent or guardian may contact us and request us to destroy the personal data.

#### 10. Retention Period

Your personal data will be kept for as long as is necessary to provide you with the requested service or as long as it necessary for our legitimate business interests (e.g., accounting purposes) for a time period specified by the applicable law. When your personal data is no longer necessary, we will immediately delete it from our systems.

#### 11. Third party links

The Website may contain third party links to other websites. We are not responsible in any manner for the privacy practices of those websites and this Privacy Policy does not apply to them.

#### 12. Cookies

**About cookies.** The Website uses cookies. A cookie is a small computer file, which consists of letters and numbers. When you visit a website, the website may send a cookie to your browser. Subsequently, your browser may store the cookie on your computer system. The main purpose of cookies is to allow a website to recognize your device.

There are two types of cookies, namely, (1) persistent cookies, which remain valid until their expiration date, unless deleted by the user before that date, and (2) session cookies, which are stored on a web browser and remain valid until the moment when the browser is closed.

Cookies do not typically contain personal data. However, personal data stored by us may be linked to the information stored in and obtained from cookies. Web servers can use cookies to: (1) identify and track users while they navigate through different pages on a website; and (2) identify users returning to a website

**What cookies do we use?** We use both persistent and session cookies, including, but not limited to, the following cookies:

- **Persistent cookies:** MR, \_\_lc\_vv, message\_text, 3rdparty, 1P\_JAR, lang, 1P\_JAR, SSID, recent\_window, HSID, \_ga, main\_window\_timestamp, MUID, MUIDB;
- **Session cookies:** \_\_cfduid, \_\_lc.visitor\_id.2633681, \_ga, \_gid, lc\_window\_state, \_\_livechat\_lastvisit, \_uetsid.

**Refuse cookies.** If you do not agree to our use of cookies, you need to either (1) discontinue your use of the Website or (2) set your browser to refuse cookies. Please be aware that some parts of the Website may not function properly without cookies. If you would like to set your browser to refuse cookies, please check your browser's help information or visit <https://www.aboutcookies.org> for more information.

**Google Analytics.** We use Google Analytics to analyze your use of the Website. Google Analytics generates statistical and other information about the Website by means of cookies. The information generated by Google Analytics in relation to the Website is used to create reports about the use of the Website. We may use the following Google Analytics advertising features: (1) Remarketing with Google Analytics; (2) Google Display Network Impression Reporting; (3) Google Analytics Demographics and Interest Reporting; and (4) Integrated services that require Google Analytics to collect data via advertising cookies and identifiers.

Opt-out from Google Analytics. If you would like to opt out from Google Analytics advertising features, you can do so through Ads Settings, Ads Settings for mobile apps, or any other available means (for example, the NAI's consumer opt-out). You can also install a Google Analytics opt-out browser add-on available at

<https://tools.google.com/dlpage/gaoptout?hl=en>.

13. Amendment of this Privacy Policy

We reserve the right to amend this Privacy Policy from time to time by posting an amended version on the Website and indicating an effective date at the top of the Privacy Policy. Your continued use of the Website after posting such an amended version will constitute your acknowledgment of the amendments and your consent to abide and be bound by the amended Privacy Policy. Please regularly review this Privacy Policy in order to be aware of any new amendments.

**Term and termination.** This Privacy Policy enters into force on the effective date indicated at the top of the Privacy Policy and remains valid until terminated or amended by us.

#### 14. Contact details

If you have any questions or concerns about this Privacy Policy, please contact the Company by email [contact@lemonunit.com.io](mailto:contact@lemonunit.com.io) or write to the following address:

LemonUnit Ltd, Siedliska 209a, 36-042 Lubenia, Poland

#### 15. Last amendment

This Privacy Policy has been last amended on 01.08.2019