

## PRIVACY POLICY

This document sets out the rules for processing by us - as the operator of the website available at [oferta.investgda.pl](https://oferta.investgda.pl) (the “Website” or “Service”) - information about you (the “User”, “Website User/s”), including your personal data and cookies.

### I. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND HOW CAN YOU CONTACT THEM?

The Controller of your data is Gdańska Agencja Rozwoju Gospodarczego spółka z ograniczoną odpowiedzialnością (“sp. z o.o.”) with its registered office in Gdańsk (80-560), at 11 Żaglowa Street, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register, under KRS number 000328827, NIP 5833054620, REGON 220714278, with share capital of PLN 589,225,000.00 (the “Controller”, “we”, “us”).

You can contact the Controller by e-mail at: [office@investgda.pl](mailto:office@investgda.pl) or by phone at: +48 58 722 03 00. You may contact us on all matters related to the processing of personal data and the exercise of your rights connected with such processing.

### II. WHO THIS PRIVACY POLICY APPLIES TO AND ITS SCOPE

This Privacy Policy applies to you as a User of the Website. It covers the rules for processing the data you provide when:

- Contacting via contact form
- Giving consent to marketing activities
- As well as data collected automatically, i.e., cookies.

Protecting the private information of Website Users is a priority for us; therefore, we make every effort to ensure you can use the Website freely and safely.

This Privacy Policy concerns all private information, including your personal data, that is collected and processed via the Website and sets out how we protect your personal data and your rights. It describes the rules for processing information about you, including your personal data and cookies.

### III. TO WHAT EXTENT AND FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

We collect your personal data, including your e-mail address and first and last name, via the contact form or by e-mail. We process such data to pursue the Controller’s legitimate interest, i.e., to respond to questions or in other matters in which you contact us using any contact method indicated on the Website. The legal basis also includes steps prior to entering into a contract, namely enabling us to present our products and services and to conduct negotiations aimed at concluding it (GDPR Art. 6(1)(b)).

If you give separate consent, the e-mail address you provide will also be used by us to send you commercial information, including direct marketing concerning services and goods offered by us and through us, via electronic means of communication or by using terminal telecommunications equipment and automated calling systems.

Where processing is based on your consent, you may withdraw that consent at any time by contacting us using the earlier mentioned contact methods, i.e., by sending a withdrawal notice to [office@investgda.pl](mailto:office@investgda.pl). Providing personal data is voluntary; however, refusal to provide them will make it impossible to use certain functions of the Website.

When you use the Website, data are also collected automatically. These are data about your activity on the Website, i.e., the IP address of the computer, the number and source of visits to the site, the time of the visit, content viewed, and the number and type of subpages opened. We do not use this information to identify you personally. These data take the form of cookies (more on cookies later in this Policy).

The above personal data are processed by the Controller to provide electronic services by making content available on the Website - in which case the legal basis for processing is its necessity for the performance of a contract (GDPR Art. 6(1)(b)) - and for technical and administrative purposes to ensure the security of the IT system and to manage that system - in which case the legal basis for processing is the Controller's legitimate interest (GDPR Art. 6(1)(f)).

The Controller operates its profile (the "fanpage") on the LinkedIn platform. Personal data processed via this portal are administered by a third party. The processing of your personal data by that entity is governed by the law applicable to the administrator of that service and by its internal regulations (e.g., privacy policies). This Privacy Policy does not govern that processing. However, the Controller may also be an independent controller of personal data processed in the course of operating the Company's fanpage, processing personal data on the following basis. Personal data are processed by the Controller on the fanpage on the LinkedIn platform for the following purposes:

- carrying out marketing activities consisting in informing about the Company and its offer via the fanpage, including by sharing posts, which is the Controller's legitimate interest (GDPR Art. 6(1)(f));
- replying to private messages sent using the portal's functionality; in such case the legal basis for processing is the Controller's legitimate interest consisting in conducting correspondence (GDPR Art. 6(1)(f));
- running discussions under posts published on the fanpage, enabling discussion via accounts set up on the LinkedIn portal, which is the Controller's legitimate interest (GDPR Art. 6(1)(f));

- obtaining statistical data — the Controller may obtain from the LinkedIn portal operator statistical data relating to the fanpage; these are created on the basis of the operator's monitoring of your activity on the fanpage; in such case the legitimate interest pursued by the Controller is the analysis of statistical data concerning the fanpage (GDPR Art. 6(1)(f)).

In any communication with the Controller via the LinkedIn platform, the Controller is automatically provided with the data indicated in your account description (first and last name or pseudonym, as well as a photo and other publicly available information). You may stop following the Controller's fanpage and delete your own comments at any time.

#### IV. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We store personal data in a form that permits identification of the data subject for as long as we need them for the purposes set out in this Privacy Policy. The period will vary depending on your contacts and cooperation with us. As a rule, the data are processed for the duration of service provision or contract performance, or until an effective objection is lodged against processing in cases where the legal basis for processing is the Controller's legitimate interest. The processing period may be extended where processing is necessary to establish, pursue or defend potential claims, and thereafter only where and to the extent required by law. Upon expiry of the processing period, the data are irreversibly deleted or anonymised (deprived of features enabling identification of a given person). We delete personal data irreversibly. Personal data processed on the basis of your consent will be stored until it is withdrawn or the purpose of processing ceases. Please note that withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

#### V. HOW DO WE PROTECT YOUR PERSONAL DATA?

All personal data obtained via our Website are processed in a manner that ensures their security, in compliance with generally applicable law, and in particular with 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 (GDPR).

#### VI. DO WE DISCLOSE YOUR PERSONAL DATA?

Your personal data may be disclosed to persons authorised by the Controller, to entities providing services to the Controller, including technical and organisational services, e-mail services and hosting services, and to other natural or legal persons and authorities to the extent and on the terms arising from generally applicable law.

Where it is necessary to disclose personal data to third parties, we require them to maintain confidentiality and information security and to use the data solely to enable provision of the relevant service to us.

We have concluded appropriate data processing agreements with entities to which we entrust personal data.

## VII. DO WE TRANSFER YOUR DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)?

As a rule, your personal data will not be transferred to countries outside the European Economic Area, subject to personal data posted on the Company's fanpage on the LinkedIn social networking site. LinkedIn Ireland Unlimited Company (Wilton Plaza, Wilton Place, Dublin 2, Ireland) ensures an adequate level of protection of processed personal data accepted by the European Commission.

The Controller will always inform you, at the time of collection, of the intention to transfer Personal Data outside the EEA. If, in the course of processing, your personal data are transferred to recipients in third countries (outside the EEA), such transfers may take place on the basis of:

- an adequacy decision (GDPR Art. 45), e.g., the United Kingdom;
- appropriate safeguards, including standard data protection clauses, an approved code of conduct, or an approved certification mechanism (GDPR Art. 46);
- binding corporate rules (GDPR Art. 47);
- specific derogations (GDPR Art. 49).

## VIII. DO WE PROFILE YOUR DATA?

We do not process your personal data by automated means, including profiling.

## IX. WHAT ARE YOUR RIGHTS IN RELATION TO PROCESSING?

In connection with the processing of your personal data and under the rules set out in the General Data Protection Regulation (GDPR), you have the right at any time to:

- access your personal data,
- request rectification of your personal data,
- request restriction of the processing of your personal data,
- request erasure of your personal data where the Controller is not required by law to process them. Despite a request for erasure in connection with an objection or withdrawal of consent, we may retain certain personal data to the extent necessary for the establishment, exercise, or defence of claims. This applies in particular to personal data including: first name, last name, e-mail address, and browsing history, which we retain for the purposes of handling complaints and claims related to the use of our services,
- data portability, i.e., the ability to obtain your personal data in a structured, commonly used, machine-readable format and the right to transmit those data to another controller. Where technically feasible, you have the right you may request the Controller to transmit their personal data directly to another controller,

- obtain information on the purposes of processing, the categories of personal data processed, the recipients or categories of recipients of those data, the planned period for storing your data or the criteria for determining that period, the rights you have under the GDPR and the right to lodge a complaint with the supervisory authority, the source of those data, automated decision-making including profiling, and the safeguards used in connection with the transfer of those data outside the European Union,
- receive a copy of your personal data,
- object to the processing of data,
- withdraw consent to processing at any time.

Upon receiving a request, we will use best efforts to handle it as quickly as possible. However, a request cannot always be fulfilled. For example, the right to erasure cannot be exercised where we are required by law to retain the data. We will inform you of the outcome in writing or by e-mail.

You have the right to lodge a complaint with the President of the Personal Data Protection Office (ul. Moniuszki 1A, 00-014 Warsaw, uodo.gov.pl), the supervisory authority for personal data protection, if you believe that your personal data are processed by the Controller in breach of data protection law.

To obtain information about your personal data, contact us by e-mail at [rodo@investgda.pl](mailto:rodo@investgda.pl) or in writing at: Gdańska Agencja Rozwoju Gospodarczego spółka z ograniczoną odpowiedzialnością, 11 Żaglowa Street, 80-560 Gdańsk. If you wish to withdraw consent to processing, you should likewise inform us by e-mail or in writing at the addresses indicated above.

## X. WHAT ARE “COOKIES” AND HOW DO WE USE THEM?

The Controller uses cookies. Cookies are data files, in particular text files, stored on your end device and intended for the use of the Website. Cookies usually contain the website name from which they originate, the period for which they are stored on the end device, and a unique number.

Cookies are used to create statistics that help understand how users use the services. Using cookies enables us to continuously improve the Website.

Two basic types of cookies are used as part of the Website’s operation: “session” cookies and “persistent” cookies. „Session” cookies are temporary files stored on the user’s end device until leaving the website or closing the software (web browser). „Persistent” cookies are stored on the user’s end device for the time specified in the cookie parameters or until the user deletes them.

By accepting cookies you consent to the storage of cookies on your computer for the purposes specified above.

You can block the storage of cookies on your device at any time. To do so, configure your browser settings accordingly. The option to disable cookie storage is usually found in the browser's "settings", "options" or "preferences". If in doubt, or for details, use your browser's "help" function.

## XI. WHAT TOOLS DO WE USE IN CONNECTION WITH THE WEBSITE?

### GOOGLE ANALYTICS

For statistical and analytical purposes, the Controller uses Google Analytics provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This tool enables the Controller to obtain information on viewership statistics, traffic within the Website, basic demographic data, etc., which is the Controller's legitimate interest (GDPR Art. 6(1)(f)). Google Analytics also enables the creation of aggregate reports. These data are statistical in nature and cannot be linked to specific users or IP addresses. The Controller uses these data to analyse user behaviour with the aim of optimising and improving the Website.

Details on data processing under the Google Analytics service are available at: <https://support.google.com/analytics/answer/6004245>

### GOOGLE ADS

The Website uses Google Ads marketing tools provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Google Ads promotes the Website in search results and on third-party sites. When you visit the Website, Google Ads automatically saves a remarketing cookie on the User's device, enabling the display of ads based on your interests. Further processing occurs if you have given Google consent to combine your browsing and app-use history with your account and to use information from your Google account to personalise ads displayed on websites. If you are logged in to your Google account when viewing the Website, Google will use your data together with Google Analytics data to create and define audience lists for cross-device remarketing. For this purpose, Google temporarily combines your data with Google Analytics data to create audience groups.

### GOOGLE ADSENSE

The Website uses the Google AdSense tool provided by Google LLC. The Controller conducts activities in this respect on the basis of the User's consent (GDPR Art. 6(1)(a)) for advertising purposes. Google AdSense collects information about Users' visits to the Website, e.g., how a user interacted with an ad or hovered the mouse cursor over an ad, and whether the User's browser displayed an ad. This information is stored on Google servers in the United States. Your IP address is shortened before further transfer. In certain cases, your full IP address is transmitted to a Google server in the United States and only then shortened. The anonymised IP address provided by the User's browser under Google AdSense is, as a rule, not combined with other Google data.

You can prevent Google from recording cookie-derived data about your use of the Website, as well as from processing such data, by installing the browser add-on available at: <https://tools.google.com/dlpage/gaoptout>. Details on data processing under the Google AdSense service are available at: <https://support.google.com/adsense?sjid=12157996769037616026-EU#topic=3373519>

Google LLC, based in the USA and using technical infrastructure located in the USA, ensures an adequate level of protection of processed personal data, accepted by the European Commission.

You can prevent Google from recording cookie-derived data about your use of the Website, as well as from processing such data, by installing the browser add-on available at: <https://tools.google.com/dlpage/gaoptout>

## MICROSOFT CLARITY

The Website uses the Microsoft Clarity tool provided by Microsoft Corporation (One Microsoft Way, Redmond, WA 98052-7329, USA). The Controller conducts activities in this respect on the basis of the User's consent (GDPR Art. 6(1)(a)). Microsoft Clarity cookies are used to track on-site user behaviour such as navigation, clicks and scrolling to help the Controller optimise the Website and the user experience. The tool primarily uses cookies to remember returning users and to identify new users. Data are collected anonymously and are used to generate heatmaps, session recordings and behaviour analytics to better understand user needs and increase conversions.

Microsoft Clarity collects anonymous data on user behaviour without identifying individuals and without processing personal data.