

PRIVACY POLICY

Our priority is to ensure the appropriate standards for handling personal data. For us, protecting the personal rights and privacy of every individual is the foundation of trust in our business relationships.

This Privacy Policy explains the personal data BookGame processes, how BookGame processes it, and for what purposes.

1. Who is responsible for processing Your data?

The data controller of Your personal data is BOOKGAME sp z o.o. with its registered office in Krakow, Dolnych Mlynów street 3/1, entered into the Register of Entrepreneurs of the National Court Register (KRS) kept by the Regional Court in Kraków XI Business Department of the National Court Register under KRS No. 0001029227, Tax ID: 6762640327, Statistical ID: 52493016000000, share capital in the amount of PLN 5.000,00, (hereinafter referred to as **“BookGame,” or “We”**).

BookGame may also act as a **data processor** for the data that You collect from Your clients when they are using services provided to You by BookGame. As a data processor, we process data in accordance with the Data Protection Regulations (as defined below) and all documented instructions of the data controller of the data. We keep the personal data confidential and do not disclose it to any third party, as well as not use it in a manner contrary to this Privacy Policy or agreement in place. We implemented appropriate technical and organizational measures to make sure that the controller is able to fulfill his data protection obligations regarding the exercise of the data subjects' rights covered by Chapter III of the GDPR.

For the purposes of this Privacy Policy, the Data Protection Regulation means applicable law on the protection of personal data, in particular, 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 (General Data Protection Regulation, hereinafter referred to as “GDPR”), as well as other regulations of Member State law implementing the GDPR, including the Polish Act on the protection of personal data dated of 10 May 20.

2. Why do we collect Your data?

We will use the personal information You disclose to provide You with our services, realize the order, respond to Your questions, communicate efficiently, and provide You with efficient customer service. The legal basis for processing personal data is Your consent and/or legitimate interest. In some cases, the legal basis for processing is compliance with a legal obligation to which the controller is subject.

Providing personal data is voluntary. However, providing our services will be completely or partially impossible if You do not provide the data.

3. What data do we collect?

a) Email address

- How is this data collected? At sign up for our service
- Why do we need this data? To create an account for You to manage our platform, to send You all necessary notifications, and to provide You support and replay any queries related to our service.
- Legal basis: Your consent and legitimate interest

b) Name, phone number, and company details

- How is this data collected? In our platform
- Why do we need this data? To provide support and process payments
- Legal basis: Legitimate interest

c) IP and browser information

- How is this data collected? Via usage
- Why do we need this data? To personalize our service if required and help to ensure Your security.
- Legal basis: Legitimate interest

4. Who has access to Your data?

We secure our website and other systems against loss, destruction, unauthorized access, modification, or distribution of Your data by unauthorized persons by implementing the appropriate technical and organizational measures. Your personal data is stored in secured networks and is only accessible by a limited number of people given special, specific rights to access such systems.

5. Who do we share data with?

Generally, we do not share Your personal information with anyone outside our organization. However, from time to time, we may share Your data only with trusted third parties:

- a) law enforcement or government authorities where they have followed due legal process to request us to disclose the information,
- b) advertising and marketing agencies to help us deliver and analyze the effectiveness of our advertising campaigns and promotions,
- c) BookGame's third-party providers of services (including payment service provider and storage provider).

If we share Your personal data with a third party, we shall use our best efforts to ensure they keep Your information secure and that they only use it in a manner consistent with this Privacy Policy and Data Protection Regulations.

6. How and for how long do we collect Your personal data?

Your data is administered and processed following the Data Protection Regulations. We keep Your data only for as long as we need it. It depends on what we are using it for, whether that is to provide services to You, for our own legitimate interests (described above), or so that we can comply with the law. If You are no longer a customer or there is no legal or business need to store the data, We will either delete it securely or, in some cases, anonymize it. These principles are extended to any third-party services with which we share Your data.

7. What are Your rights related to personal data?

You have the following right:

- a) right of access
- b) right to obtain a copy
- c) right demand rectification of the data related to You
- d) right of limitation
- e) right of portability
- f) right to erasure and
- g) right to object for legitimate reasons.

The above-listed rights may be limited in justified circumstances, especially due to the specific nature of the business activity run by BookGame.

You have the right to object to us processing Your personal data in relation to Your particular situation. You are also free to opt out of direct marketing.

In situations where we have obtained Your consent to process Your personal data, You also have the right to withdraw this consent at any time. However, this will not influence the lawful status of any processing that occurred before the withdrawal.

You can use these rights:

- Via email: _____
- By postal order: _____

8. Data transfers

We will only send data outside of the European Economic Area ('EEA') to work with third parties we use to deliver services to You or comply with a legal duty. If we do transfer data outside the EEA, we will make sure that it is protected in the same way as if it were being used in the EEA. We will use one of the following safeguards to ensure that it is protected:

Unless the transfer is based on an "adequacy decision", is otherwise "subject to appropriate safeguards," or if a "derogation for specific situations" applies, each within the meanings given to them in Articles 45, 46, and 49 of the GDPR respectively, not transfer, access or process such Your personal data outside the EEA without Your prior written consent (not to be unreasonably withheld or delayed).

9. How do we use cookies files?

Cookies are text information stored by the browser of the individual visiting our website. Cookies are files saved on your phone, tablet, or computer when You visit a website.

BookGame does not automatically collect any information except the information contained in cookies if You have consented to it.

BookGame collects information using cookies for the following purposes:

- a) Customizing the content, appearance, size, and other parameters of the service to a specific device and user preferences.
- b) Collecting general, statistical demographic information (e.g., about the region from which the connection is made).

BookGame collects information using the following categories of cookies:

- a) temporary files that remain on the customer's device usually until the web browser is closed. After closing the browser, the files are deleted. Such cookies are used by BookGame, among others, to remember the customer's data.
- b) permanent files that remain on the customer's device for a specified period or until the customer deletes them. Files are not deleted when the browser is closed.

Most web browsers, after installation, default to accept cookies. Depending on the browser, you can disable the option of accepting cookies or deleting cookies from the browser using your browser's tools.

How to manage cookies?

Your web browser's settings can change your preferences regarding cookie storage. Most browsers also let You review and erase cookies as well. Please be aware. However, that website will not operate properly without cookies enabled.

For more information, please refer to the appropriate documentation provided by the browser manufacturer.

10. Your Consent

By using our services, You signify that You agree to the terms of this Privacy Policy. If You do not agree with the terms of our Privacy Policy, please do not provide us with personal information.

11. Complaints

If You have any complaints concerning how We process your personal data, please email us at _____ . Please note that You have the right to raise a complaint with the supervisory authority that is responsible for the protection of personal data in the country

where You live or work or in which You think a breach of data protection laws might have taken place.