

## Privacy Policy

[document effective as of 29.11.2022]

### 1. General provisions

#### a) What is personal data?

Personal data is information about an identified or identifiable natural person. The principles of personal data processing, the obligations of the controller and the rights of the data subject are regulated in the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free flow of such data, and repealing Directive 95/46/EC (hereinafter: "GDPR"), the Personal Data Protection Act of May 10, 2018, and in special provisions.

#### b) What is this document about? Who is the Controller of your personal data and how can you contact them?

This Privacy Policy features information about the type and scope of processing of your personal data by Arago sp. z o.o., based in Brodnica (87-300), ul. Podgórna 82A, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court in Zielona Góra, 8th Commercial Division of the National Court Register under KRS number: 0000686904, TIN: 9562326208, REGON: 367787398 (hereinafter: "Controller").

You can contact the Controller on matters related to the processing of your personal data:

- by mail to the company's address: ul. Podgórna 82A, 87-300 Brodnica;
- by e-mail at: [privacy@arago.green](mailto:privacy@arago.green);
- by phone at: +48 600 991 359.

The Controller informs that they have not appointed a Data Protection Officer.

#### c) What is the purpose of introducing this document?

This document has been created with you in mind - the confidentiality of your personal data and the protection of your privacy are of great importance to us.

### 2. Personal data processing

The Controller processes your personal data in connection with:

#### a) The conclusion and performance of a contract in connection with our operations

If we enter into a contract with you as our contracting counterparty, we receive personal data directly from you or from our partners and process it for the following purposes:

- to enter into a contract with you and perform the contract (basis of Article 6(1)(b) GDPR);
- to get in touch on contract performance, prevent fraud, maintain business relations, which is our legitimate interest (basis of Article 6(1)(f) GDPR);
- to carry out our legal obligations in the field of taxation and accounting, in particular: bookkeeping, tax settlement, archiving of data for accounting purposes (the basis of Article 6(1)(c) GDPR in connection with the provisions of tax law and the Accounting Act);
- to establish, assert and defend claims, which is our legitimate interest (the basis of Article 6(1)(f) GDPR).

Provision of personal data to the extent necessary for the fulfillment of legal obligations is mandatory and results from tax regulations and the Accounting Act.

Provision of personal data for the purpose of concluding a contract is voluntary, but necessary for the conclusion of this contract and its execution.

Personal data is stored for the period of contract performance and thereafter until the statutory obligation to store data ceases

(5 years from the end of the fiscal year) and until the prescription of claims.

#### b) The fact of being a contact person/a person authorized to represent the interests of the person or entity using our products or services.

If you represent a person or entity using our products or services or you have been designated by them for ongoing contacts in connection with the conclusion and performance of a contract, we receive your personal data from that person, entity or directly from you.

When this is the case, we process your identification data (e.g., first and last names, the name of the person you represent or the name of the entity you represent, the scope of the matters you deal with, your PESEL), data on the authority you have given (e.g., the date of the authority given, the type and scope of the authority given), contact data (e.g., telephone number, e-mail).

We process your personal data for the following purposes:

- to enter into a contract between a person or entity using our products or services and us and to perform the contract, and in particular to verify your authority to enter into the contract and to contact you as the contact person in connection with the performance of the contract (the basis of Article 6(1)(f) GDPR), i.e. on the basis of our legitimate interest, which is to enable us to perform the contract efficiently on an ongoing basis and to enable us to verify your authority to enter into the contract on behalf of the person/entity;
- to make tax settlements and keep accounting records (the basis of Article 6(1)(c) GDPR), i.e. the processing of data is necessary for the fulfillment of legal obligations and arising from generally applicable laws, including tax law and accounting regulations;
- to establish, assert or defend claims between the person/entity entering into the contract and us (the basis of Article 6(1)(f) GDPR), i.e. the processing is necessary for purposes arising from our legitimate interests;
- to establish or maintain contact with the person or entity for whom the contract is executed, through you, which is our legitimate interest (the basis of Article 6(1)(f) GDPR).

If you provide us with your personal data directly, it is voluntary, while necessary for the conclusion and performance of the contract and the establishment of a relationship in connection with its execution. Failure to provide personal data will result in the inability to conclude and perform the above contract, as well as to maintain any contact.

Your personal data is processed for the period necessary for the purposes indicated above, in particular, for the period of maintaining the relationship and performance of the contract concluded with the person/entity, and thereafter will be stored until the prescription of claims or until the expiration of the obligation to store data under the law (e.g. tax law - 5 years from the end of the fiscal year).

#### c) The fact of being a person/entity granting the Controller a power of attorney to represent their interests in relation to third parties in connection with the use of products and services offered by the Controller or their cooperating entities.

If you have granted a power of attorney to represent your interests to third parties in connection with the use of products and services offered by the Controller or their cooperating entities, we receive your personal data directly from you.

When this is the case, we process your identification data (e.g. your name, the scope of the matters you authorize the Controller to perform, your PESEL), data concerning the authorization you

have given (e.g. the date as well as the type and scope of the authorization given), contact data (e.g. telephone number, e-mail).

We process your personal data for the following purposes:

- to enter into and perform a contract between you and a third party, and in particular to verify our authority to represent you before third parties (basis of Article 6(1)(f) GDPR), i.e. on the basis of our legitimate interest, which is to enable us to efficiently enter into a contract on your behalf and to enable us to verify our authority to enter into it;
- to make tax settlements and keep accounting records (the basis of Article 6(1)(c) GDPR), i.e. the processing of data is necessary for the fulfillment of legal obligations and arising from generally applicable laws, including tax law and accounting regulations;
- to establish, assert or defend claims between you, us, and a third party with whom a contract will be concluded on your behalf (the basis of Article 6(1)(f) GDPR), i.e. the processing is necessary for the purposes of our legitimate interests;
- to establish or maintain contact with you, which is our legitimate interest (basis of Article 6(1)(f) GDPR).

If you provide us with your personal data directly, it is voluntary, while it is necessary to represent you, to conclude and perform a contract on your behalf, and to establish a relationship in connection with its execution. Failure to provide personal data will result in the inability to represent you, conclude and perform the above contract, as well as to maintain any contact.

Your personal data is processed for the period necessary for the purposes indicated above, in particular for the period of maintaining the relationship, representing you, as well as performing the contract concluded on your behalf, and then will be stored until the prescription of claims or until the expiration of the obligation to store data under the law (e.g. tax law - 5 years from the end of the fiscal year).

**d) The desire to take advantage of promotional programs, vouchers, coupons offered by the Controller in cooperation with third parties**

If you express a desire to take advantage of promotional programs, vouchers, coupons offered by the Controller in cooperation with third parties, we obtain personal data directly from you or our partner and process them for the following purposes:

- to carry out the program/activity - until all activities related to the organization have been carried out, based on Article 6(1)(b) GDPR, in connection with the conclusion and performance of a contract to which the data subject is a party;
- for the Controller to comply with a legal obligation, i.e. the obligation to store accounting documents - on the basis of Article 6(1)(c) GDPR in conjunction with Article 74(2)(4) of the Accounting Act (the obligation to store data for a period of five years from the end of the fiscal year);
- in the case of a complaint - until it is resolved, which is the performance of the Controller's legitimate interest (Article 6(1)(f) GDPR);
- to assert or defend claims from the conduct of the program/activity, until the prescription of such claims, which is the fulfillment of the Controller's legitimate interest (Article 6(1)(f) GDPR).

Providing personal data is voluntary, but necessary to take advantage of promotional programs, vouchers, coupons offered by the Controller.

**e) The desire to use financial and insurance intermediation services, including matching and presenting you with the current offer of financial and insurance services of entities with which the Controller cooperates**

In the event that you express an interest in obtaining financing or insurance of the subject matter of the contract through the Controller, we receive your personal data directly from you or from our Partner to the extent necessary to submit an application and obtain financing or insurance from a third party cooperating with the Administrator.

We process your data for the following purposes:

- to provide you with a financial intermediation service related to obtaining financing or insurance of the subject of the contract, including matching and presenting you with the current offer of services of entities cooperating with the Controller, so the processing of personal data is necessary for the conclusion and performance of the contract for the provision of financial and insurance intermediation services concluded between you and the Controller (Article 6(1)(b) GDPR);
- to settle your remuneration with financial institutions, insurance companies with which you have concluded a contract through the Controller (the basis of Article 6(1)(f) GDPR), i.e. on the basis of our legitimate interest;
- to defend against possible claims that may arise in connection with the Controller's provision of services to you (the basis of Article 6(1)(f) GDPR), i.e. the processing is necessary for purposes arising from our legitimate interests.

If you provide us with your personal data directly, it is voluntary, while it is necessary to provide an offer of funding, insurance, submission of an application, and then possible conclusion and execution of the contract. Failure to provide personal data will result in the inability to perform the above-mentioned activities. Your personal data is processed for the duration of the financial intermediation service and, in the case of an insurance product, for the entire term of the product.

Personal data necessary for settlement with a third party will be kept until the expiration of the period for which the institution/entity cooperating with the Controller may claim reimbursement of remuneration from the Controller, in connection with certain actions on your part (e.g., early repayment of a loan) or until the prescription of claims that may arise in connection with settlement between the Controller and the cooperating entity.

**f) The fact that you are our contracting counterparty or our contracting counterparty's nominee for contact/performance of the contract**

If our contracting counterparty, which is an individual, company or other type of entity, is represented by you or you have been appointed by it for ongoing contacts in connection with the conclusion and performance of a contract, we receive your personal data from that contracting counterparty or directly from you.

When this is the case, we process your identification data (e.g., first and last names, name of the entity you represent or cooperate with, name of the position/role you hold, name of the department you work in, scope of matters you deal with), data regarding the authority you have been granted (e.g., date of authority granted, type and scope of authority granted), contact data (e.g., business phone number, e-mail).

We process your personal data for the following purposes:

- to enter into and perform the contract between the contractor and us, and in particular to verify your authorization to enter into the contract and to contact you as the contact person in connection with the performance of the contract (the basis of Article 6(1)(f) GDPR), i.e. on the basis of the legitimate interest pursued by both us and the contracting counterparty, which is to enable us to perform the contract efficiently on an ongoing basis and to enable us to verify your authorization to enter into the contract on behalf of the contracting counterparty;

- to make tax settlements and keep accounting records (the basis of Article 6(1)(c) GDPR), i.e. the processing of data is necessary for the fulfillment of legal obligations and arising from generally applicable laws, including tax law and accounting regulations;
- to establish, assert or defend claims between the contracting counterparty and us (the basis of Article 6(1)(f) GDPR), i.e. the processing is necessary for purposes arising from our legitimate interests;
- to establish or maintain a business relationship with a contracting counterparty, through you, which is our legitimate interest (the basis of Article 6(1)(f) GDPR).

If you provide us with your personal data directly, it is voluntary, while necessary for the conclusion and performance of the contract and the establishment of business relationships. Failure to provide personal data will result in the inability to conclude and perform the above contract, as well as to maintain any business relationships.

Your personal data is processed for the period necessary for the purposes indicated above, in particular, for the period of maintaining the business relationships and performance of the contract concluded with the contracting counterparty, and thereafter will be stored until the prescription of claims or until the expiration of the obligation to store data under the law (e.g. tax law - 5 years from the end of the fiscal year).

#### g) Your use of our hotline

When you contact our consultant via our hotline, we process the following types of personal data: your voice, first name, last name, telephone number and other data you provide to us during the call, which is recorded. Call monitoring covers all incoming and outgoing calls preceded by information on the recording - regardless of whether the call was made during the hours the hotline is active or outside those hours. We collect your personal data directly from you in connection with the establishment of telephone contact.

We process your data for the following purposes:

- to ensure the proper conduct of conversations conducted via the hotline system, recorded in the form of a recording - based on your voluntary consent to record the conversation (the basis of Article 6(1)(a) GDPR),
- to seek to enter into a contract with the Controller for the construction of a photovoltaic installation, energy storage, heat pump, obtaining financing or insurance coverage (the basis of Article 6(1)(b) GDPR),
- resulting from the legitimate interests of the Controller, which are, among others, to increase security and improve the quality of customer service, to reduce the possibility of allowing violations of applicable laws or norms of social coexistence by persons making the calls, as well as by persons receiving such calls, to secure evidence (including the identification of the violator) to clarify whether a violation has occurred, to ensure the protection of personal data of persons making the calls, as well as the personal data of others referred to at the time of the call, to enable objective assessment of the exercise of the callers' rights, to handle a request made via the hotline regarding any issues other than those specified in the paragraph above, to establish, defend and assert claims and to create compilations, analyses and statistics for the Administrator's internal needs, to tailor the content of the Administrator's services (e.g. hotline service) to your needs, to ensure the security of these services, as well as their continuous improvement, and to handle inquiries and complaints about the Administrator's products and services (the basis of Article 6(1)(f) GDPR).

In the event that the processing of personal data were to take place for a purpose other than those indicated above, each time this will be done after obtaining your prior consent to process

your personal data, to the extent and for the purpose indicated in such consent (the basis of Article 6(1)(a) GDPR).

The duration of the processing of your personal data depends on the purpose for which the data are processed, therefore:

- in the case of processing based on the consent you have given - your personal data will be processed until you are informed that you have withdrawn your consent, and in case your consent is not withdrawn - for a period of up to 3 months from the moment you attempt to make contact through the hotline;
- when the processing of data is necessary for the conclusion of a civil law contract, we will process the data until the prescription of claims under the contract and subject to the relevant provisions of generally applicable law;
  - for the period that is necessary to protect our interests as a Data Controller,
  - for other purposes based on our legitimate interest for the duration of the validity of those purposes or until you object.

#### h) Contacting us via snail mail, e-mail, phone, contact form

When you contact us by snail mail, e-mail, or telephone (other than the hotline), via the contact form, we obtain personal data directly from you in terms of your first name, last name, contact information, and other information you provide.

In such a case your personal data are processed in connection with the fulfillment of the Controller's legitimate interest in analyzing an inquiry you have sent or an issue you have reported, with a purpose of providing a response, as well as in connection with the need to ensure smooth communication within the framework of ongoing correspondence (the basis of Article 6(1)(f) of the GDPR).

We process your personal data for the validity period of our legitimate interest or until you object.

#### i) Submitting and processing of complaints

When you submit a claim for material or design defects in part or all of a photovoltaic, energy storage, heat pump installation, or irregularities related to the use of other products or services provided by the Controller, we process the following types of personal data: first and last name, address/location of installation, product/service type indication, description of the request, e-mail address, correspondence address and other data you provide in your complaint request.

We collect your personal data directly from you in connection with your submission:

- By means of the postal operator, sending the submission to: ul. Podgórna 82a, 87-300 Brodnica;
- By e-mail to [bok@arago.green](mailto:bok@arago.green);
- Through the form provided on the Controller's website;
- By phone at 600 991 359;
- In person at the Controller's office (87-300 Brodnica, ul. Podgórna 82a), by filling out the appropriate claim form.

We process your data for the following purposes:

- to handle the complaint process, as well as in connection with the potential possibility of disputes between you and the Controller (fulfillment of the Controller's legitimate interest - Article 6(1)(f) GDPR);
- in connection with bookkeeping, settlement of processed complaints (necessary for compliance with a legal obligation to which the Controller is subject - Article 6(1)(c) GDPR).

Providing personal data in the complaint process is voluntary, but failure to provide some of it may hinder or delay the processing of the complaint, or even prevent us from contacting you.

The duration of the processing of your personal data depends on the purpose for which the data are processed, so when the processing of the data is necessary to process a claim, the data will be processed for the period necessary to process and fulfill the claim. In addition, we will process the data until the

expiration of possible prescription periods for claims under the relevant provisions of generally applicable law.

**j) Exercising warranty rights**

When you want to exercise your warranty rights for material or design defects in part or all of a photovoltaic, energy storage, heat pump installation, or irregularities related to the use of other products or services provided by the Controller, we process the following types of personal data: first and last name, address/location of installation, product/service type indication, description of the request, e-mail address, correspondence address and other data you provide in your complaint request. We collect your personal data directly from you in connection with your submission:

- By means of the postal operator, sending the submission to: ul. Podgórna 82a, 87-300 Brodnica;
- By e-mail to [bok@arago.green](mailto:bok@arago.green);
- Through the form provided on the Controller's website;
- By phone at 600 991 359;
- In person at the Controller's office (87-300 Brodnica, ul. Podgórna 82a), by filling out the appropriate form.

We process your data for the following purposes:

- to handle the process of drawing upon the warranty, as well as in connection with the potential possibility of disputes between you and the Controller (fulfillment of the Controller's legitimate interest - Article 6(1)(f) GDPR),
- to fulfill contractual rights (Article 6(1)(b) GDPR),
- to bookkeep and make any settlements (necessary for compliance with a legal obligation to which the Controller is subject - Article 6(1)(c) GDPR).

Providing personal data in the process of drawing upon the warranty terms and conditions is voluntary, but failure to provide some of it may hinder or delay the processing of your application, or even prevent us from contacting you.

We will process your personal data for the period of processing your request, unless we are required by law to process the data for longer, or we will keep it longer in case, any claims are made, for the period of limitation prescribed by law, in particular the Polish Civil Code.

**k) Sending us requests to exercise your rights in relation to the processing of personal data under GDPR**

You are entitled to certain rights in connection with the Controller's processing of your personal data (information about them can be found below in the Privacy Policy), so you can address correspondence to us regarding the exercise of these rights. In connection with such correspondence, we process your identification data, contact data, and other data provided by you or another person who sends a request on your behalf to exercise your rights under GDPR. In case the application is not sent directly by you, but by an attorney or legal representative, we additionally process data on this attorney or representative, i.e. their identification data, contact data and data on the type of authorization.

We process applicants' personal data for the following purposes:

- to contact and correspond regarding a submitted request for the exercise of rights under GDPR (the basis of Article 6(1)(c) GDPR), as the processing of personal data is necessary for the fulfillment of the Controller's legal obligation the basis of Article 12(1)-(3) GDPR;
- for the purpose of archiving correspondence conducted on the handling of a sent request for the exercise of rights under the GDPR, for evidential purposes and to demonstrate that we have timely responded to a sent request, which is our legitimate interest (the basis of Article 6(1)(f) of the GDPR).

Providing personal data is necessary for the realization of the request made.

Personal data is processed for the period of correspondence, and then will be archived for evidence purposes until the expiration of the period of prescription of claims.

**l) Interest in the Controller's offer and willingness to enter into cooperation on the basis of an employment contract or civil law contract**

If you are interested in the Controller's offer and would like to enter into cooperation with the Controller, you can express your willingness to participate in the recruitment process conducted by the Controller by:

- **Requesting telephone or e-mail contact through the contact form posted on the website:** <https://arago.green/kontakt/>

When you provide us via a form provided on the website or in any other form with your personal data in the scope of name, surname, e-mail address, telephone number in connection with your interest in the Controller's offer and undertaking cooperation with them, we process your personal data on the basis of voluntary consent of the data subject (Article 6(1)(a) GDPR).

Your personal data will be processed until you effectively withdraw your consent, but no longer than until the requested interview has taken place and, in the case of employment negotiations, until the recruitment process is completed.

- **Self-contact with the Controller by e-mail or telephone in connection with interest in the offer and undertaking cooperation**

When you initiate contact by e-mail, snail mail or telephone, we obtain personal information directly from you in terms of your first name, last name, contact details and other information you provide.

In this case, your personal data is processed to pursue the legitimate interest of the Controller in analyzing the inquiry you have sent or the issue you have reported and to respond to you (the basis of Article 6(1)(f) GDPR).

We process your personal data until you object, but no longer than until the requested interview has taken place and, in the case of employment negotiations, until the recruitment process is completed.

- **Establishing contact with the Controller through a third party (recruitment intermediary) in connection with interest in the offer and taking up cooperation**

If you provide us through a third party (recruitment intermediary) with your personal data in terms of first name, last name, email address, phone number and other information provided by you in connection with your interest in the Controller's offer and undertaking cooperation with them, we process your personal data on the basis of the data subject's voluntary consent for the Controller to share personal data with the Controller through the recruitment intermediary (Article 6(1)(a) GDPR). Your personal data will be processed until you effectively withdraw your consent, but no longer than until the Controller realizes the establishment of contact regarding recruitment, and in the case of employment negotiations - until the recruitment process is completed.

- **Processing of personal data in connection with participation in the recruitment process, conduct of negotiations and possible conclusion of a contract of employment/cooperation**

When the parties express their desire to establish an employment or cooperation relationship, personal data shall be processed to assess the candidate's qualifications and skills needed for the position for which the candidate is applying, and to select a suitable candidate for the job as part of the current recruitment process, as well as to select a suitable candidate for the job as part of future recruitment processes - if consent has been given by the candidate in this regard.



If the preferred form of employment is a contract of employment, the personal data of candidates are processed for the above purposes on the basis of:

- Article 6(1)(c) GDPR - in terms of personal data indicated in Article 22 § 1 of the Labor Code (first name or first names, last name, date of birth, contact details, education, professional qualifications, course of previous employment) - the processing of personal data is necessary to fulfill a legal obligation incumbent on the Controller.
- Article 9(2)(b) GDPR in connection with the provisions of the Law on Vocational and Social Rehabilitation and Employment of Persons with Disabilities - with regard to disability data (in case the candidate provides such data on his/her own initiative in the application documents) - processing is necessary for the fulfillment of obligations and the exercise of specific rights by the Controller or the data subject in the field of labor law, social security and social protection,
- Article 6(1)(f) GDPR - with regard to personal data collected during the recruitment interview and the results of any job tests - the processing is necessary for the purposes of the Controller's legitimate interests in verifying the qualifications and skills of job applicants in order to select a suitable person for the position for which recruitment is being conducted,
- Article 6(1)(a) GDPR, i.e. on the basis of the candidate's voluntary consent - with regard to data provided by the candidate in the application documents, other than the data indicated in Article 22 (1) § 1 of the Labor Code and data on disability;
- Article 6 (1) (a) GDPR and Article 9 (2) (a) GDPR, i.e. on the basis of the candidate's voluntary consent to process personal data for future recruitment processes - with respect to all personal data included in the application documents sent by the candidate.

If the preferred form of employment is a civil law contract, the personal data of candidates are processed for the above purposes on the basis of:

- Article 6(1)(b) GDPR - in terms of data necessary to assess the candidate's competencies and qualifications (first name, last name, date of birth, contact details, education, professional qualifications, history of previous employment), as the processing of such data is necessary to take action at the request of the data subject before entering into a contract;
- if the candidate includes health or other special category data in the application documents - on the basis of Article 9(2)(a) GDPR, i.e. on the basis of the candidate's consent;
- with regard to personal data other than those indicated above and included in application documents - on the basis of Article 6(1)(a) GDPR, i.e. on the basis of the candidate's consent;
- Article 6(1)(f) GDPR - with regard to personal data collected during the recruitment interview and the results of any qualification tests - the processing is necessary for the purposes of the Controller's legitimate interests, which consist in verifying the qualifications and skills of candidates for cooperation to select a suitable person for the position for which recruitment is being conducted,
- Article 6(1)(a) of the GDPR and possibly Article 9(2)(a) of the GDPR, i.e. on the basis of the candidate's voluntary consent to the processing of personal data for the purposes of future recruitment processes - with respect to all personal data contained in the application documents sent by the candidate.

The provision of data in the job application in the following scope: first name, last name, date of birth, contact information, education, professional qualifications, previous employment

history, is necessary for the purpose of participation in the current recruitment process and possible future recruitment.

The consequence of failing to provide these data is the inability to consider a given candidacy in the recruitment process.

Provision of otherwise personal data is voluntary and does not condition participation in the recruitment process.

Personal data provided by the candidate related to:

- participation in the current recruitment process - will be kept until the recruitment process for the position is completed,
- participation in future recruitment processes - will be kept until the candidate withdraws his/her consent to process his/her data for this purpose, but no longer than 2 years from the moment of obtaining consent to process personal data for this purpose.

**m) The Controller's use of video surveillance in facilities and areas belonging to it**

When you are in the facilities or areas belonging to the Controller, your personal data in the form of your image is processed in pursuit of the Controller's legitimate interest related to the need to ensure the security of persons and property (basis: Article 6(1)(f) GDPR).

All data recorded via video surveillance cameras are saved and available for up to 3 months. Only the image (no sound) is recorded and stored on a medium.

In the event that information is obtained that the recording constitutes evidence in a proceeding, this period will be extended until the legal conclusion of the proceeding.

**n) Your desire to receive from us information about our own products, services, programs organized by the Controller and other information of a marketing nature, by electronic means (SMS, e-mail) or by telephone call**

If you express your desire to receive from us electronically (SMS, e-mail) or via a telephone call information about our own products, services, programs organized by the Controller and other information of a marketing nature, we obtain personal data directly from you or our partner, in terms of your first name, last name, e-mail address or telephone number.

Your personal data in this case is processed on the basis of your voluntary consent (Article 6(1)(a) GDPR and Article 10(2) of the Act of 18 July 2002 on the provision of electronic services and Article 172(1) of the Act of 16 July 2004, Telecommunications Law).

You may withdraw your consent at any time, which will not affect the legality of the processing carried out on the basis of consent before its withdrawal.

We will process your personal data until we are informed that you have withdrawn your consent, and in case your consent is not withdrawn - for a period of 3 years from the moment your personal data was obtained.

**o) Displaying, using our website available at [www.arago.green](http://www.arago.green), and our use of cookies**

When we use cookies on our website (as detailed below), we process your personal data for preferential, statistical, marketing and other purposes, depending on which cookies you have given us consent to (Article 6(1)(a) GDPR).

The data is stored until you withdraw your consent, which you may revoke at any time, which will not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

**p) Processing of personal data in connection with conducting a survey of website user activity**

The Data Controller uses the Hotjar tool to conduct a survey of website user interest and activity. The tool is provided by an external entity, i.e. Hotjar Ltd., Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta.

In connection with the use of the tool, we process your personal data specifically as follows:

- information about the operating system and web browser you are using,

- the subpages you view within our website,
- time spent on our site and its sub-sites,
- transitions between different sub-pages within our website,
- the source from which you go to our service,
- places you click the mouse on.

From this data, user profiles are compiled under a pseudonym. Accordingly, we process your personal data for the following purposes:

- to conduct analyses of the operation, popularity, use of the website, based on your voluntary consent (basis of Article 6(1)(a) GDPR);
- to optimize the website, based on your expressed voluntary consent (basis of Article 6(1)(a) GDPR).

The data is processed until you withdraw your consent, but no longer than 1 year. If you no longer want your activity to be measured by Hotjar, withdraw your consent to the processing of personal data by clicking on the "Change your consent" option located on the main board displayed on the website and informing you about the cookie, and then moving the slider next to the selected category, or use the link: <https://www.hotjar.com/opt-out>.

#### q) Visiting the Controller's social media profiles

The Controller maintains profiles on the following social media:

- LinkedIn – <https://pl.linkedin.com/company/aragogreen>
- Facebook – <https://www.facebook.com/arago.green/>;
- Instagram – <https://www.instagram.com/arago.green/>;
- YouTube - <https://www.youtube.com/channel/UC3s4-ecBn5znzLF3lPst61g>

Running a social media profile requires obtaining your personal data in connection with subscribing to our fan pages or social media channels (clicking the "Like", "Observe", "Subscribe", etc. icon), publishing a comment by you under any of the posts made on the fan page or channel, as well as in connection with sending a message via the social network.

We may process your personal data in connection with the activities described above in particular to the following extent:

- user ID (may include first name and last name);
- your identification and other information to the extent published by you on your own profile on the relevant social network;
- profile photo (thanks to it, in some cases, we can get to know your image);
- other photos (which may also depict an image) posted by you voluntarily under our posts;
- the content of your comments and the content of the conversation you have with us via the social network in question;
- statistical data on visits to our social media profiles or channels.

Accordingly, we process your personal data for the following purposes:

- to maintain a profile or channel on social media, under the terms and conditions set by the operators of these social networks and to inform you through it about activities, services, events we organize, to share knowledge, as well as for the purpose of building and maintaining a community and for the purpose of communication through the available functionalities of the social networks (comments, chat, messages, including event sign-ups), which is our legitimate interest (the basis of Article 6(1)(f) GDPR);
- conduct analyses of the functioning, popularity, use of profiles on social media, which is our legitimate interest (basis of Article 6(1)(f) GDPR).

#### Facebook

When using the statistics function on Facebook, we and Meta Platforms Ireland Limited act as joint controllers of the data processed for statistics purposes. Arrangements between the joint controllers, which define the responsibilities for processing

personal data, can be found here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

According to the document, Meta Platforms Ireland Limited has assumed primary responsibility under the GDPR for processing data for statistical purposes and for fulfilling all relevant obligations under the GDPR.

Tracking of activity on websites or apps may occur regardless of whether you are logged in or registered on a social network.

We emphasize that we have no influence on the online activity tracking applied by a given social network, which means that we cannot, for example, turn it off.

You can find detailed information on activity tracking in the privacy policies of social network operators.

As for the statistics we receive from the operators, we have limited influence on them.

If you are a logged in/registered user of a particular social network, please verify your privacy settings to match your preferences.

#### **Remember that it is voluntary to provide your personal data**

Information that is contained in private messages sent to us via social networks will be stored until your user profile on the social network is deleted or until our legitimate interest is realized or you object to the processing of your personal data, whichever comes first.

In the case of information held by us as part of your shared comments, it will be available on our profile or channel until you delete it.

Personal data collected by a given social network, i.e. history of posts, history of activity and messages sent, are subject to storage under the terms of the rules of a given social network. Statistical data on visitors to our social media profiles, will be processed for the duration of the availability of such data on a given social network in accordance with its terms and conditions.

**Remember that in addition to us, the Controller of your personal data is the operator of the particular social network you use and through which you visit our profile. In addition, read the rules and privacy policy of the social network you use and through which you visit our profile.**

### 3. Cookies

Depending on your settings on our website, in addition to technically necessary cookies, we may use cookies for statistical, analytical or advertising purposes.

Cookies are small text files containing information about your activity on the website and storing them on the device from which you access the Website.

In accordance with applicable law, we may store cookies on your device if it is necessary for the operation of the Website (these cookies are described below as necessary).

For the use of any other types of cookies (especially analytical or advertising cookies), we need your consent.

Strictly essential cookies do NOT legally require your prior consent.

They are automatically installed on your device when you access our website or make certain choices on it.

They are necessary for the proper functioning of the website, including the performance of certain tasks, such as, for example, the delivery of services you have ordered through the website.

These cookies are not deleted when you stop browsing the website but have a limited validity period.

If you give us your consent when you first visit our website, or later through the cookie settings panel available at the bottom of our "**Change Your Consent!**" page, we will also use other cookies that you have consented to.

You can change your cookie settings at any time using the cookie settings panel available at the bottom of the website by clicking on the "**Change your consent**" button.

#### 4. Transfer of personal data outside the European Economic Area

As the Controller uses Google Analytics, Google Tag Manager, Google Ads, HotJar as well as maintains social media profiles, personal data may be transferred by Google, HotJar or the operator of the respective social network outside the European Economic Area, in particular to the USA.

In this case, Google, HotJar or the operator of the social network is required to apply appropriate safeguards, in particular EU standard contractual clauses.

In this case, the user may request a copy of these relevant safeguards from Google, HotJar or the social network operator. The Controller points out that more information about the processing of your personal data by Google, HotJar and the social network operators can be found in their privacy policies:

- Google – <https://policies.google.com/privacy>
- HotJar <https://www.hotjar.com/legal/policies/privacy/#enduserenglish>
- LinkedIn <https://pl.linkedin.com/legal/privacy-policy>
- Facebook <https://pl-pl.facebook.com/privacy/explanation/>
- Instagram [https://help.instagram.com/519522125107875/?maybe\\_redire ct\\_pol=0](https://help.instagram.com/519522125107875/?maybe_redire ct_pol=0)
- YouTube [https://www.youtube.com/intl/ALL\\_pl/howyoutubeworks/user-settings/privacy/](https://www.youtube.com/intl/ALL_pl/howyoutubeworks/user-settings/privacy/)

#### 5. Recipients of your personal data

The recipients of your personal data will be:

- Controller's authorized personnel;
- entities processing personal data on behalf of the Controller for the fulfillment of the purposes for which the data are collected (in particular, entities providing IT solutions and IT services, entities providing technical, marketing, legal, financial, recruitment, lead generation, call center services, postal service providers, couriers, security companies); these entities must have access to the data in order to perform their duties.  
These entities will have access to personal data only to the extent necessary to carry out their duties;
- public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes that result from the provisions of generally applicable law;
- in the case of data processing within social media profiles, the recipients will be the operators of these portals, as well as visitors to our social media profiles.

#### 6. Your rights

You have the following rights in connection with our processing of your personal data:

- request access to your personal data, including obtaining a copy of the data, rectification, erasure or restriction of processing,
- the right to data portability, where the processing is carried out on the basis of consent or contract by automated means,
- where the basis for the processing of personal data is the Controller's legitimate interest - the right to object at any

time to object to the processing of personal data for reasons related to the person's particular situation,

- to withdraw the consent at any time without affecting the legality of the processing that was carried out on the basis of the consent before its withdrawal.

You can withdraw your consent by sending a request to the following e-mail address: [privacy@arago.green](mailto:privacy@arago.green).

**You can make a request for the exercise of your rights in person or through a person authorized to act for and on behalf of the data subject, via snail mail or e-mail, to the contact information provided in Section 1(b) of the document.**

In addition, if you believe that our processing of your personal data violates the GDPR, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Office for Personal Data Protection (details on how to lodge a complaint can be found here: <https://uodo.gov.pl/pl/83/155>).

#### 7. Automated decision-making

We do not make any decisions with regard to you based only on automated processing, including profiling.

#### 8. Changes in the Privacy Policy

This Privacy Policy may be updated in case of amendment of legal regulations that affect the processing of your personal data, as well as when we introduce any changes in relation to the personal data processing.