

## **PRIVACY POLICY**

### **GENERAL PROVISIONS**

As the Data Controller, on the basis of the applicable regulations, i.e. the General Data Protection Regulation (“GDPR”), as the OXCALL company, we recognize the importance of personal data protection and treat it as one of the main goals of our business.

Before providing us with any personal data, we encourage you, as the Website user, to read this Privacy Policy carefully, as it contains important information regarding the protection of personal data and security measures implemented to ensure compliance with applicable regulations.

Please note that this Privacy Policy forms part of the Website's terms of use and applies only to the Website and not to other websites - which may be linked - such other websites may be subject to their own privacy and cookie policies.

Your personal data will be processed by us in accordance with the principles of lawfulness, fairness and transparency, data minimization, correctness, integrity and confidentiality. Further, your personal data will be processed only for the purposes which have been informed to you and no longer than it is necessary for these purposes. Your personal data will be processed in accordance with applicable regulations, taking into account all confidentiality obligations provided for therein.

#### **1. DATA CONTROLLER**

Based on the applicable regulations, we are the Data Controller for this Website. We have implemented generally accepted standards of technology and operational security to protect personal data against loss, misuse, unauthorized alteration or destruction. We will notify you immediately in the event of any breach of your personal data that may put you at serious risk.

#### **2. PERSONAL DATA SUBJECT TO PROCESSING**

The term “personal data” means information relating to an identified or identifiable individual. In particular, personal data collected by the Website include:

##### **1. Navigation data**

IT systems and software ensuring the proper functioning of the Website may, in the course of their normal operation, obtain certain personal data sent automatically when the user uses Internet communication protocols. This information is not collected in order to assign it to specific identified persons, although due to their nature, they could, by compiling and linking with data received by third parties, allow for the identification of users. This category of data usually includes the IP addresses or domain names of computers used by users who connect to the website, URLs, connection times, methods of submitting a server request, size of the file received as a response, numeric code indicating the status of the response sent by the server (success, failure, etc.) and other parameters related to the user's operating system and IT environment.

These data are used only to obtain anonymous statistical information related to the use of the website, to control its correct operation, to provide various functionalities required by the user, for security reasons, and to determine the identity of persons responsible in the event of possible cybercrimes. This data is deleted after 12 months.

## 2. Data provided voluntarily by you

When using the Website, you have the option to voluntarily provide your personal data, such as name and e-mail address, in order to receive commercial information, request a quote for services, register using the “Registration” form, contact the data administrator using the “Contact us” form. These data will be processed by us in accordance with applicable regulations. If you provide us with personal data of third parties, you declare that you are authorized to do so and that you will comply with all obligations of the Data Controller under applicable law, and that you hereby fully release us from liability and indemnify us against any disputes, claims, claims for compensation for damages caused by processing, etc., which may be raised by third parties whose personal data are processed by you in this way.

## 3. Cookies and similar technologies

We collect personal data using cookies. For more information on our use of cookies and similar technologies, please see our Cookie Policy.

## 3. PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF PROCESSING

Your personal data will be processed by us for the following purposes:

1. in order to perform a contract to which you are a party or in order to take, at your request, preliminary actions in connection with such a contract[1];
2. in order to conduct statistical research/analyses based on collective or anonymous data, and therefore without the possibility of identifying the user, to evaluate the Website's operation, measure network traffic for the Website and evaluate its functionality and interest in the Website[2];
3. to meet our legal obligations[3];
4. to exercise or defend our rights[4];
5. in order to receive from you, with your consent, job applications, sent on your own initiative[5].

Providing personal data for the purposes mentioned above is voluntary, although failure to provide data may render it impossible to fulfil your requests or for us to fulfil our legal obligations.

## 4. DATA RECIPIENTS

Your personal data may be shared by us, in accordance with the purposes set out in section 3, to the following entities:

1. to entities obliged to provide services offered by the Website - for example, obliged to send e-mails and analyse the Website operation - such entities usually act as Processors for us;
2. persons authorized to process personal data who have agreed to non-disclosure or are subject to an appropriate statutory obligation of secrecy; (e.g. our employees and contractors); (entities listed in a. and b. are collectively referred to as “data recipients”);
3. judicial authorities in the performance of their functions, in accordance with applicable regulations.

## 5. TRANSMISSION OF PERSONAL DATA TO THIRD COUNTRIES

We do not plan to transfer your personal data to recipients outside the European Economic Area

(EEA).

## 6. DATA STORAGE

We process your personal data only as long as it is necessary to achieve the purposes set out in section 3. Without prejudice to the terms set out above, your personal data will be processed by us for the time permitted by applicable law, in order to protect our rights and interests. More information about the period

of storing personal data and the criteria used to determine such period can be obtained after contacting the Data Controller.

## 7. RIGHTS OF DATA SUBJECTS

Under the applicable provisions, you have the right to request from us access to your personal data as well as rectification and/or deletion of your personal data at any time. You can also object to the processing, request the restriction of processing or the transfer of your personal data in a structured, commonly used and machine readable format.

Requests should be sent by e-mail to the following address: [bok@oxcall.com](mailto:bok@oxcall.com)

Pursuant to Applicable Regulations, you have the right to lodge a complaint with the competent supervisory authority if you believe that your personal data has been or is being processed unlawfully.

## 8. RISK

When using the services provided electronically, one should assure the security of personal data. Failure to comply with the recommendation to care for the security of personal data is associated with the risk of:

- a) interference with the integrity of personal data consisting in their modification or deletion,
- b) access by third parties to the data exchange process between you and the Controller,
- c) spam
- d) your system being infected with malware,
- e) phishing of your data,
- f) forgery of security protocols and certificates.

To minimize the above risks:

- a) do not give your password and login to anyone,
- b) always use up-to-date software versions, e.g. browsers,
- c) check the certificate before logging into the website.

## 9. AMENDMENTS TO THE PRIVACY POLICY

This Privacy Policy is valid as of 2021. We reserve the right to amend or update it from time to time.

Any such changes will be binding immediately after they are published on the Website: we therefore encourage you to regularly check this part of the Website to be up to date with the changes.

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[1] Pursuant to Article 6(1)(b) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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, OJ EU L 119/1 of 4 May 2016, hereinafter: “GDPR”)

[2] Pursuant to Article 6(1)(f) GDPR

[3] Pursuant to Article 6(1)(c) GDPR

[4] Pursuant to Article 6(1)(f) GDPR,

[5] Pursuant to Article 6(1)(a) GDPR.