

PRIVACY POLICY OF THE EARNITY APPLICATION

I. PRIVACY PROTECTION

1.1 Earnity Innovations sp. z o.o. based in Warsaw ("we", "Company") attach particular importance to respecting the privacy of Users visiting the Application. Data collected in log files are used solely for the purpose of administering the System. Servers automatically record data such as the page request sent by the User, the date and time of the request and response, device data (e.g., hardware model), and operating system type. Most log files (server logs) are not associated with any specific User. All data collected from Users through the Earnity System is intended for our use.

1.2 All capitalized terms have the meanings ascribed to them in the Regulations, which are available at <https://assets.earnity.pl/terms-and-conditions.pdf> ("Regulations"), unless otherwise provided in this Privacy Policy.

II. PROCESSING OF PERSONAL DATA

2.1 General

We process your personal data to perform a contract with you (after all, using our application is nothing more than using services provided by us electronically, e.g., accessing the content of our application) and arising from consumer regulations. The legal basis for processing your personal data is Article 6(1)(b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract) and Article 6(1)(c) of the GDPR (processing is necessary for compliance with a legal obligation to which the controller is subject).

With separate consent, we may also process your personal data for marketing purposes (e.g., emailing you to participate in promotions and sending other marketing information). The legal basis for processing your personal data for these purposes is therefore Article 6(1)(a) of the GDPR (the data subject has given consent to the processing of his or her personal data for one or more specific purposes).

2.1.1 Subject to the provisions of this Policy, the controller of personal data processed in the Application is the Service Provider, i.e., Earnity Innovations sp. z o.o. based in Warsaw, al. Jana Pawła II 43A/37B 01-001, entered in the entrepreneurs' register of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, XII Economic Division of the National Court Register under the KRS number: 0001101800; share capital: PLN 5,000.00, NIP: 5273109661, REGON: 528447502, email address: office@earnity.pl.

2.1.2 All personal data provided by you is collected in various ways, depending on the services provided:

- a. information provided by the User – Users using registration forms are asked to provide personal data;
- b. information obtained when using the mobile application (in this regard, the Service Provider is the data controller of Users' personal data) – among them may be:

(i) **IP address** – every phone connected to the Internet has a unique number assigned, i.e., an IP address; based on this, one can identify the country from which a given User is connecting to the network. Additional information may be collected during the use of the application, including: IP address assigned to the Client's computer or external IP address of the Internet provider, domain name, browser type, access time, operating system type. These logs are used solely for the analysis of any technical problems with registration, logging in, and using the Application;

(ii) **text files (cookies)** sent to the User's phone when visiting the Application. Cookies store only data required by the website for proper operation, including the identification of the currently logged-in User.

c. **data provided by the Administrator** (in this regard, the Service Provider is the entity processing Users' personal data), such as: the validity and duration of the agreement between the User and the Administrator, salary ranges, form of remuneration, form of employment.

d. **data provided by the User** in connection with cooperation with the Administrator and containing a product to be advertised, necessary to be sent to the User's address or to specify another pickup point such as: first name, last name, phone number, email address, country of delivery, street name, postal code, city, name and address of the pickup point.

e. **data provided by the User** in connection with the possibility of concluding another cooperation agreement with other entities available in the CRM (Administrators), such as: first name, last name, age, names and photos of cooperating companies, platform name(s) owned by the User, names of owned social media accounts, number of followers on owned social media accounts, category and subcategory of owned social media accounts.

f. **data provided by the User** during registration and account creation in the Application, such as: email address, first name, last name, age, gender, phone number, platform name(s) owned by the User, names of owned social media accounts, number of followers on owned social media accounts, category and subcategory of owned social media accounts.

2.1.3 The User undertakes to:

- a. not attempt to breach the security of the System's services;
- b. not modify or interfere in any way with the source code of the System's software;
- c. not interfere with the databases available through the System;
- d. not modify, for any purpose, the System's services, trademarks, descriptions, and other data and objects of intellectual property contained on the System's website;
- e. use the Services offered by the Company in accordance with the provisions of the applicable law in Poland, the Regulations, and the accepted practices in the relevant area;
- f. not provide or transmit content prohibited by applicable law;
- g. use the Services offered by the Company in a non-invasive manner, respecting their personal rights (including the right to privacy) and all rights available to them;
- h. use the Services offered by the Company in a manner that does not disrupt the functioning of the System, particularly by using specific software or devices;

- i. not take any actions aimed at bypassing security measures or disrupting the stability and functionality of authorized servers or System software;
- j. use all functionalities in the System solely for personal use; their use for other purposes is permissible only with the explicit consent of the authorized person;
- k. refrain from posting statements that are offensive, vulgar, violate good manners or the good reputation of the Company or the System;
- l. not copy files attached in the System and post them outside the System.

2.2 Scope of processed personal data

2.2.1 The Company processes the data indicated above, data collected in connection with the use of the Application, and the following data provided by the User as part of registration for the Application:

- a. first name (mandatory),
- b. last name (mandatory),
- c. email address (mandatory),
- d. date of birth (optional),
- e. phone number (optional),
- f. gender (optional),
- g. name of owned social media account (mandatory),
- h. link to owned social media account (mandatory),
- i. number of followers on owned social media account (mandatory),
- j. category of owned social media account (mandatory),
- k. subcategory of owned social media account (mandatory).

2.2.2 The Company processes the data indicated in point 2.1.2.d) above, data collected in connection with agreements between the User and the Administrator specifying the possibility of sending a shipment to the User's address or another pickup point.

- a. first name (mandatory),
- b. last name (mandatory),
- c. phone number (mandatory),
- d. email address (mandatory),
- e. address (mandatory if data from point "f" is not provided),
- f. pickup point (mandatory if data from point "e" is not provided).

2.2.3 The Company processes the data indicated in point 2.1.2.e) above, data collected in connection with the External Network module covering additional Collaborations:

- a. first name (mandatory),
- b. last name (mandatory),
- c. age (optional),
- d. names and photos of cooperating companies (mandatory),
- e. platform name(s) owned by the User (mandatory),
- f. names of owned social media accounts (mandatory),
- g. number of followers on owned social media accounts (mandatory),
- h. category of owned social media accounts (mandatory),
- i. subcategory of owned social media accounts (mandatory),

j. preferred form of cooperation (optional).

2.2.4 Additionally, we may process the photo added by you in your User profile. You add the photo completely voluntarily and can change or delete it at any time. The added photo will be visible to other Administrators of the Earnity System;

2.2.5 Providing data marked in point 2.2.1 above as "mandatory" is necessary for the provision of services within the Earnity System. Providing additional (optional) data is voluntary and may help improve our services, but not providing them does not result in the inability to provide services.

2.3 Purposes of processing personal data

The personal data provided by you will be processed for the following purposes:

a. for the Company to take necessary actions related to the performance of the contract, which is concluded through the User's acceptance of the Application Regulations, particularly to handle the Application and provide functionalities in the System, send email messages with information about the status of your activity in the System, and contact you in case of any issues with the System's functioning. In this case, the legal basis for processing your data is the contract concluded with us. Providing data is voluntary but necessary for the conclusion and performance of the contract.

b. to pursue the legitimate interests of the Company, particularly:

(i) direct marketing of the Company's own products or services;

(ii) establishing, investigating, or defending claims by the Company arising from its business activities;

(iii) ensuring network and information security, particularly preventing unauthorized access attempts;

(iv) for administrative and statistical purposes,

(v) handling complaints.

In this case, the legal basis for processing your data is the legitimate interest pursued by the Company. You have the right to object to the processing of your personal data if it is justified by a particular situation. The objection can be made in any form;

c. for marketing activities and sending commercial information, including, for example, receiving messages in the form of Notifications, information about promotions, sales, events, and contests organized by the Company – based on the consent given by you for the processing of personal data for the purposes specified by us each time.

Giving consent is voluntary each time. The given consent can be withdrawn at any time. However, withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal. The consent can be withdrawn by you by sending a relevant request to the Service Provider via email at: office@earnity.pl;

Additionally, the personal data provided by the Service Provider to the Administrator will be processed by the Service Provider to take necessary actions related to the preparation and performance of the contract with the Administrator, which is concluded based on separate agreements between the Administrator and the Service Provider. In this case, the legal basis for processing your data is the contract concluded with the Administrator (who is your principal). Providing data is voluntary but necessary for the conclusion and performance of the contract and access to the Content.

2.4 Period of processing personal data

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

a. in the case of the User using the Application – data will be processed until the User's decision to voluntarily deactivate the account or the decision to deactivate their account taken by the Service Provider.

b. in the case where the processing of your data is based on the legitimate interest pursued by the Company, data will be processed for as long as they are necessary for the purposes for which they are processed or until an effective objection is raised;

c. in the case where the legal basis for processing personal data is your consent, data will be processed by us for the purposes specified in the consent until its withdrawal. After the withdrawal of consent, your data will be processed to the extent necessary to assert or defend our claims and defend against claims until the limitation period expires;

d. in the case where the legal basis for processing data is the necessity of processing them to fulfill a legal obligation incumbent on us, data will be processed for as long as required by the provisions of law.

2.5 Notifications

2.5.1 In the case of using the Application and your consent, you may receive the following Notifications from us:

- a. invitations to register an account (Email Notification each time until you register an account in the Application);
- b. notification of the creation of new Content (Notification in the Application);
- c. reminder to review the Content (Notification in the Application, if you do not open the notification within 1 hour of its delivery);
- d. Notification of archived Content (push Notification to your phone);
- f. Notification requesting you to join Content (push Notification in the Application whenever material needs to be delivered to the Administrator);
- g. Notification from the Administrator regarding the attached content (Notification in the Application whenever you attach any Content).

2.5.2 Your consent to receive Notifications from us will increase your satisfaction and enjoyment of using the Application.

2.6 Data Recipients

2.6.1 Recipients of the personal data processed by the Company will include:

- a. The Administrator, who is your principal, who has concluded a usage agreement with us for the System and a data processing agreement.
- b. Other Users using the Application;
- c. Entities processing data on behalf of the Company supporting the operation of the System and IT systems;
- d. Other administrators processing your personal data on their own behalf, especially entities engaged in postal or courier activities;
- e. State authorities authorized under the law, especially in connection with the performance of supervisory tasks or in the scope of anti-money laundering efforts.

2.6.2 Based on the information obtained within the Application, the Company may compile aggregate statistical summaries, which may be disclosed to third parties. However, such summaries do not contain any data allowing for the identification of individual Users.

2.7 User Rights

2.7.1 In connection with the processing of personal data, the User has the right to:

- a. request more detailed information about how their personal data is used;
- b. request access to personal data and the provision of copies of data that have been provided to us;
- c. receive in a structured, commonly used, machine-readable format the personal data that have been provided and, if technically feasible, request the transfer of this data to another controller without hindrance, if their processing is based on consent or a contract and is carried out in an automated manner;
- d. request the correction of any inaccuracies in the data we hold;
- e. request the deletion of any data for which there are no longer legal grounds for processing;
- f. object to a particular processing based on legitimate interests for reasons related to the User's particular situation, including profiling, unless our processing grounds override the interests, rights, and freedoms of the User;
- g. request restriction of data processing, e.g., while a complaint is being investigated;
- h. withdraw consent – if the basis for processing is consent;

2.7.2 Statements regarding the exercise of the above rights and any comments should be directed to the email address: office@earnity.pl

2.7.3 If, despite our support, you believe that personal data is being processed in violation of applicable law, you have the right to lodge a complaint with the supervisory authority – the President of the Office for Personal Data Protection.

III. Security

3.1 We make every effort to protect the System from unauthorized access by third parties. To this end, measures such as firewalls, server security devices, encryption devices, and physical security measures are employed. All data is encrypted between the server and the User's computer, including forms.

3.2 The Application contains links to other websites. We recommend that after going to other websites, you review the privacy policy applicable there. We are not responsible for the privacy policy of websites to which links are placed on the System pages.

IV. Final Provisions

4.1 The current Privacy Policy is always available at <https://assets.earnity.pl/privacy-policy.pdf>

Version from February 2024.