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cDiploma APPLICATION PRIVACY POLICY

info@cdiploma.com

www.cdiploma.com

Dear User!

Thank you for downloading the cDiploma Application.

Before you use the Service, please read the Privacy Policy. It explains the manner and rules for the administration and processing of your personal data, your rights and provides information on how we care for your personal data.

Pursuant to Article 13(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27/04/2016 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) (OJ L 119, p. 1), hereinafter the “GDPR”, we hereby inform you that:

§1 DEFINITIONS

1. **“Controller”** – the Controller of the personal data, Veriori Spółka Akcyjna with its registered office at ul. Aleje Jerozolimskie 142B, 02-305 Warsaw (Poland), entered into the register of enterprises kept by the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register, under KRS No. [National Court Register No.] 0000717939, NIP No. [Tax ID No.] 7010801662, REGON No. [Statistical ID No.] 369471720, e-mail: info@veriori.pl, <https://pomoc.veriori.pl>, tel: +48 (22) 188-52-91, fax: +48 (22) 188-52-93, which determines, through the Management Board, the means and purposes of the processing of personal data;
2. **“Personal Data”** – any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
3. **“GDPR”** – 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);
4. **“Application”** – mobile application – the Veriori cDiploma application for mobile devices.

5. “**VERIORI SA**” – the owner of the Application and the Controller.
6. “**User**” – a person who uses the Application on a mobile device.
7. “**Terms**” – Veriori cDiploma Application Terms and Conditions, available in the Application and at www.veriori.com.

§2 GENERAL INFORMATION

1.1 INTRODUCTION

1. By using the Application, the User confirms that he/she has read and accepts this Privacy Policy.
2. All personal data of the Users of the mobile Application are protected by law, including in particular the GDPR.

§3 CONTROLLER

1. VERIORI SA is the Controller of your Personal Data which determines, through the Management Board, the means and purposes of the processing of personal data; it is hereinafter referred to as the Controller.

§4 PERSONAL DATA PROTECTION OFFICER

We have appointed the Data Protection Officer with whom you may contact in matters concerning the protection of your personal data by e-mail at legal@cdiploma.com or by sending a letter to the address of our registered office indicated in §1.

§5 PURPOSE OF PROCESSING OF PERSONAL DATA

You have the right to withdraw your consent to the processing of your personal data at any time, but the withdrawal of the consent does not affect the lawfulness of the processing which had been made on the basis of your consent prior to its withdrawal.

The purposes of processing your data have been specified. We will process your data as the Controller:

1. The Users’ personal data are processed by the Controller for the purpose of providing services in the mobile Application.
2. The Users’ personal data may be processed also when it is necessary to fulfil legally justified goals realized by the Controller or for the purpose of creating statistical summaries concerning the use of the mobile Application by the Users.
3. The Users’ personal data (location data only) may be processed also when it is necessary for creating reports on the occurrence of counterfeit products or documents in a given region.

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4. For analytical purposes [better selection of services to the needs of our customers, general optimization of our products, optimization of service processes, building knowledge about our customers, financial analysis of our company, etc.] being the pursuit of our legitimate interest (based on Article 6(1)(f) of the GDPR);
5. For the purpose of customer satisfaction survey which is the pursuit of our legitimate interest of determining the quality of our service and the level of satisfaction of our customers with products and services (based on Article 6(1)(f) of the GDPR);
6. In order to perform an agreement and on the basis of an agreement concluded with issuers of documents that offer the possibility of their verification by means of the Application, if we concluded it (based on Article 6(1)(b) of the GDPR);

§6 RTYPE OF DATA COLLECTED IN THE APPLICATION

The Controller may collect the following data while providing the Application services :

- A. Technical data on logging in to the mobile Application.
- B. Data about the User's device, i.e. the operating system, model, language used on the device, device ID.
- C. Location data of the User.
- D. Data about documents verified with the Application.

§7 RIGHT TO OBJECT

1. You have the right to object at any time to the processing of your data described above. We will no longer process your data for these purposes unless we can demonstrate that there are compelling legitimate grounds for the processing of your data which override your interests, rights and freedoms or we will need your data for the establishment, exercise or defence of legal claims.
2. You have the right to object at any time to the processing of your data for direct marketing purposes. If you exercise this right, we will no longer process your data for such purposes.

§8 DURATION OF DATA STORAGE

1. We can anonymise your personal data, i.e. location data related to the scanned document, which means that they will constitute only statistical data and it will be impossible to associate them with you, thus they will

cease to be personal data in which case we will be able to process them as long as Veriori has an economic or legal interest in it.

2. We can anonymise your personal data, i.e. data on documents related to the scanned document, which means that they will constitute only statistical data and it will be impossible to associate them with you, thus they will cease to be personal data in which case we will be able to process them as long as Veriori has an economic or legal interest in it.
3. Your personal data, i.e. technical data referred to in §6 point A and B obtained as a result of the use of the Application will be processed for the period when you use the Application; when you deactivate the Application by removing it from the mobile device and do not log in for a continuous period of 6 calendar months, counted from the first day of the new month after deactivation (e.g. If you removed the application on 4 June, the 6-month period will be counted from 1 July, which means that on 1 January of the next year, we must delete your personal data). These data may also be anonymised, in which case the period of cessation of processing ends earlier.

§9 DATA RECIPIENTS

1. Your personal data may be disclosed to issuers of documents, i.e. companies with which we cooperate under the Application and whose documents you can verify in our Application.
2. Your data may also be accessed by our subcontractors (processors), for example a law firm that provides services to us, IT companies, loss adjusters, contractors providing loss adjustment services. We have concluded data processing agreements concerning your personal data with all these companies and they can process your data only for the purposes pursued by Veriori and described herein, ensuring the required level of security.
3. The Controller reserves the right to disclose selected information about the User to authorised state institutions that will submit a request for such information, based on an appropriate legal basis.

§10 RIGHTS OF DATA SUBJECTS

1. According to the GDPR, you have:
 - 1.1. the right to access your data and receive a copy thereof;
 - 1.2. the right to have your data rectified (corrected);
 - 1.3. the right to data erasure, restriction of data processing;
 - 1.4. the right to object to data processing;

1.5. the right to data portability;

1.6. the right to lodge a complaint with a supervisory authority.

§11 INFORMATION ON VOLUNTARY DATA PROVISION

Providing data is voluntary, although it is necessary to use the Application.

§12 AUTOMATED DECISION MAKING

1. In the process of analysing the market of counterfeit documents, we make decisions in an automated manner, including profiling, based on the location data of the device, which was used to identify the counterfeit document by the User. These decisions are made fully automatically by machine learning algorithms based on analysis and assessment methods. Decisions made in such an automated manner affect the preparation of a report by Veriori, which may be generally available or delivered to our partners. The data used in this way will go through the process of anonymisation and it will not be possible to associate them directly with you.

§13 FINAL PROVISIONS

1. This Policy may change from time to time. Users are asked to check the date of the last amendment to this Policy to verify the relevant changes.
2. All letters, requests, motions and objections related to the protection of personal data should be sent to the Controller's address provided in §1 of this Policy or to the e-mail address legal@cdiploma.com. By sending a letter to the e-mail address the User consents to receive a reply in the same form.