Privacy and data protection

The Privacy Policy describes the principles of how we process information about you, including personal data and cookies.

1. Definitions

- Service The "FinBuzz" online service operating at https://finbuzz.app
- External Service Online services of partners, service providers, or clients cooperating with the Administrator
- **Service/Data Administrator** The administrator of the Service and Data (hereinafter referred to as the Administrator) is the company "Błażej Burkot Solutions", operating at the address: ul. Rakowicka 22C/205, 31-510 Kraków, with the assigned tax identification number (NIP): 6772410557, providing services electronically through the Service.
- **User** A natural person for whom the Administrator provides electronic services via the Service.
- **Device** An electronic device with software through which the User accesses the Service.
- Cookies Text data collected in the form of files stored on the User's Device.
- **GDPR** Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).
- **Personal Data** 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, identification number, location data, online identifier, or one or more specific factors determining the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- Processing Any operation or set of operations performed on personal data or sets of personal data, whether automated or not, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Profiling** Any form of automated processing of personal data that involves using personal data to evaluate certain personal aspects of a natural person, in particular to analyze or predict aspects concerning that person's work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.
- **Consent** The freely given, specific, informed, and unambiguous indication of a data subject's wishes by which they, by a statement or a clear affirmative action, agree to the processing of their personal data.
- **Personal Data Breach** A security breach leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data that is

transmitted, stored, or otherwise processed.

- **Pseudonymization** The processing of personal data in such a way that it can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is stored separately and is subject to technical and organizational measures preventing its attribution to an identified or identifiable natural person.
- Anonymization An irreversible process applied to data that destroys or overwrites personal
 data, making it impossible to identify or associate a given record with a specific user or natural
 person.

2. Data Protection Officer

Based on Article 37 of the GDPR, the Administrator has not appointed a Data Protection Officer.

For matters related to data processing, including personal data, please contact the Administrator directly.

3. Types of Cookies

- Internal Cookies files placed and read from the User's Device by the teleinformatics system of the Service.
- External Cookies files placed and read from the User's Device by the teleinformatics systems
 of external services. Scripts of external services that may place Cookies on the User's Device
 have been deliberately included in the Service through scripts and services provided and
 installed in the Service.
- Session Cookies files placed and read from the User's Device by the Service during a single session of a given Device. These files are deleted from the User's Device after the session ends.
- **Persistent Cookies** files placed and read from the User's Device by the Service until they are manually deleted. These files are not automatically deleted after the session ends unless the User's Device configuration is set to remove Cookies at the end of the session.

4. Data Storage Security

- Mechanisms for Storing and Reading Cookie Files The mechanisms for storing, reading, and exchanging data between Cookies saved on the User's Device and the Service are implemented through built-in web browser mechanisms. These mechanisms do not allow the retrieval of other data from the User's Device or from other websites visited by the User, including personal data or confidential information. The transmission of viruses, trojans, or other malware to the User's Device is also practically impossible.
- Internal Cookies The Cookies used by the Administrator are safe for Users' Devices and do not contain scripts, content, or information that could compromise personal data security or the security of the Device used by the User.
- External Cookies The Administrator takes all possible measures to verify and select service partners with User security in mind. The Administrator collaborates with well-known, large

partners with global public trust. However, the Administrator does not have full control over the content of Cookies originating from external partners. To the extent permitted by law, the Administrator is not responsible for the security of external Cookies, their content, or their licensed use by scripts installed in the Service from external sources. The list of partners is provided later in the Privacy Policy.

Cookie Control

- The User can independently change the settings related to the storage, deletion, and access to data stored in Cookies by any website at any time.
- Information on how to disable Cookies in the most popular desktop browsers is available from the following providers:
 - Managing Cookies in **Chrome**
 - Managing Cookies in Opera
 - Managing Cookies in FireFox
 - Managing Cookies in Edge
 - Managing Cookies in Safari
 - Managing Cookies in Internet Explorer 11
- The User can delete all previously stored Cookies at any time using the tools available on their Device, through which they access the Service.
- User-Side Security Risks The Administrator applies all possible technical measures to ensure the security of data stored in Cookies. However, data security also depends on the User's actions. The Administrator is not responsible for data interception, session hijacking, or deletion caused by the User's intentional or unintentional actions, viruses, trojans, or other spyware that may have infected the User's Device. Users should follow the internet security recommendations to protect themselves from these risks.
- **Personal Data Storage** The Administrator ensures that all efforts are made to keep the voluntarily provided personal data secure, with access limited and used strictly for the intended purposes of processing. Additionally, the Administrator takes all necessary precautions to prevent data loss by implementing appropriate physical and organizational security measures.
- **Password Storage** The Administrator declares that all passwords are stored in an encrypted format using the latest security standards and guidelines. Decrypting passwords used in the Service is practically impossible.

5. Purposes for Which Cookies Are Used

- Improving and facilitating access to the Service
- · Personalizing the Service for Users
- Enabling login to the Service
- Marketing and remarketing on external services
- Advertising services
- · Affiliate services

- Conducting statistics (users, number of visits, types of devices, connection, etc.)
- · Serving multimedia services
- Providing social media services

6. Purposes of Personal Data Processing

Personal data voluntarily provided by Users is processed for one of the following purposes:

- Provision of electronic services:
 - User account registration and maintenance services within the Service and related functionalities
 - Newsletter service (including sending advertising content with consent)
 - Commenting/liking posts in the Service without requiring registration
 - Sharing information about content posted on the Service in social media or other websites
- Communication between the Administrator and Users regarding the Service and data protection
- Ensuring the Administrator's legitimate interest

Data about Users collected anonymously and automatically is processed for one of the following purposes:

- · Conducting statistics
- Remarketing
- Serving advertisements tailored to User preferences
- · Managing affiliate programs
- Ensuring the Administrator's legitimate interest

7. Cookies from External Services

The Administrator uses JavaScript scripts and web components from partners in the Service, who may place their own Cookies on the User's Device. Remember that you can control which Cookies are allowed for each website in your browser settings. Below is a list of partners or their services implemented in the Service that may place Cookies:

- · Multimedia Services:
 - YouTube
- Social Media / Integrated Services: (Registration, Login, Content Sharing, Communication, etc.)
 - Twitter
 - Facebook
 - Google+
- Advertising Services and Affiliate Networks:

- · Google Adsense
- Statistics Services:
 - Google Analytics

Services provided by third parties are beyond the control of the Administrator. These entities may change their terms of service, privacy policies, data processing purposes, and methods of Cookie usage at any time.

8. Types of Collected Data

The Service collects data about Users. Some data is collected automatically and anonymously, while other data consists of personal information voluntarily provided by Users when signing up for various services offered by the Service.

Anonymously Collected Data (Automatically Gathered):

- IP address
- Browser type
- · Screen resolution
- · Approximate location
- Opened subpages of the Service
- Time spent on each subpage of the Service
- · Operating system type
- · Address of the previously visited subpage
- · Referring website address
- Browser language
- · Internet connection speed
- Internet service provider

Data Collected During Registration:

- First name / Last name / Username
- Email address
- IP address (collected automatically)

Data Collected When Subscribing to the Newsletter:

- First name / Last name / Username
- Email address
- IP address (collected automatically)

Data Collected When Adding a Comment:

- First name / Last name / Username
- · Email address
- Website address
- IP address (collected automatically)

Some data (excluding identifying information) may be stored in Cookies. Some data (excluding identifying information) may be shared with the statistical service provider.

9. Access to Personal Data by Third Parties

As a rule, the only recipient of personal data provided by Users is the Administrator. The data collected as part of the services provided is not shared or sold to third parties.

Access to data (most often based on a Data Processing Agreement) may be granted to entities responsible for maintaining the infrastructure and services necessary for operating the Service, such as:

• Hosting companies providing hosting or related services to the Administrator.

Entrusting Personal Data Processing – Hosting, VPS, or Dedicated Server Services

To operate the Service, the Administrator uses the services of an external hosting, VPS, or Dedicated Server provider – **Google Cloud Poland Sp. z o.o.** All data collected and processed within the Service is stored and processed in the provider's infrastructure located in Poland.

10. Method of Processing Personal Data

Personal Data Voluntarily Provided by Users:

- Personal data will not be transferred outside the European Union unless it has been published as a result of an individual action by the User (e.g., posting a comment or entry), making it accessible to anyone visiting the Service.
- Personal data will not be used for automated decision-making (profiling).
- Personal data will not be resold to third parties.

Anonymized Data (Without Personal Data) Collected Automatically:

- Anonymized data (without personal data) will be transferred outside the European Union.
- Anonymized data (without personal data) will not be used for automated decision-making (profiling).
- Anonymized data (without personal data) will be resold to third parties.

11. Legal Basis for Processing Personal Data

The Service collects and processes User data based on:

- 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, repealing Directive 95/46/EC (General Data Protection Regulation GDPR):
 - Article 6(1)(a) The data subject has given consent to the processing of their personal data for one or more specific purposes.
 - Article 6(1)(b) Processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract.
 - Article 6(1)(f) Processing is necessary for the purposes of the legitimate interests pursued by the administrator or by a third party.
- Act of 10 May 2018 on Personal Data Protection (Dz.U. 2018, item 1000)
- Act of 16 July 2004 Telecommunications Law (Dz.U. 2004 No. 171, item 1800)
- Act of 4 February 1994 on Copyright and Related Rights (Dz.U. 1994 No. 24, item 83)

12. Personal Data Processing Period

Personal Data Voluntarily Provided by Users:

As a general rule, the specified personal data is stored only for the duration of the service provided within the Service by the Administrator. The data is deleted or anonymized within 30 days after the termination of service (e.g., deletion of a registered user account, unsubscribing from the Newsletter, etc.).

An exception applies in cases where it is necessary to secure legally justified purposes for further data processing by the Administrator. In such cases, the Administrator will retain the specified data for no longer than 3 years from the time of the User's request for deletion, in the event of a violation or suspected violation of the Service's terms and conditions by the User.

Anonymized Data (Without Personal Data) Collected Automatically:

Anonymized statistical data, which does not constitute personal data, is stored by the Administrator for the purpose of maintaining service statistics for an indefinite period.

13. User Rights Related to Personal Data Processing

The Service collects and processes User data based on:

· Right of Access to Personal Data

Users have the right to access their personal data, which can be exercised by submitting a request to the Administrator.

• Right to Rectification of Personal Data

Users have the right to request the Administrator to promptly rectify any inaccurate personal

data and/or complete any incomplete personal data, which can be exercised by submitting a request to the Administrator.

· Right to Erasure of Personal Data

Users have the right to request the Administrator to promptly delete their personal data, which can be exercised by submitting a request to the Administrator. For user accounts, data deletion involves anonymizing data that allows for User identification. The Administrator reserves the right to delay the execution of a deletion request to protect a legally justified interest (e.g., if the User has violated the Terms of Service or if the data was obtained as part of correspondence). In the case of the Newsletter service, the User can delete their personal data independently by using the unsubscribe link provided in every email message.

• **Right to Restrict Processing of Personal Data** Users have the right to request a restriction on the processing of their personal data in cases specified in Article 18 of the GDPR, including situations where the accuracy of personal data is contested. This right can be exercised by submitting a request to the Administrator.

· Right to Data Portability

Users have the right to obtain their personal data from the Administrator in a structured, commonly used, and machine-readable format. This right can be exercised by submitting a request to the Administrator.

· Right to Object to Personal Data Processing

Users have the right to object to the processing of their personal data in cases specified in Article 21 of the GDPR. This right can be exercised by submitting a request to the Administrator.

· Right to File a Complaint

Users have the right to file a complaint with the supervisory authority responsible for personal data protection.

14. Contacting the Administrator

You can contact the Administrator through one of the following methods:

- Postal Address ul. Rakowicka 22C / 205, 31-510 Kraków
- Email Address contact@finbuzz.app

15. Service Requirements

- Restricting the storage and access to Cookies on the User's Device may cause some Service functions to malfunction.
- The Administrator is not responsible for any malfunctioning Service features if the User restricts the ability to store and read Cookies in any way.

16. External Links

The Service—within articles, posts, entries, or User comments—may contain links to external websites with which the Service Owner does not cooperate. These links, as well as the websites or

files they lead to, may pose a risk to your Device or the security of your data. The Administrator is not responsible for content located outside the Service.

17. Changes to the Privacy Policy

- The Administrator reserves the right to modify this Privacy Policy at any time without informing Users regarding the use of anonymous data or Cookies.
- The Administrator reserves the right to modify this Privacy Policy concerning the processing of Personal Data. Users with registered accounts or subscribed to the Newsletter will be notified via email within 7 days of the policy update. Continued use of the services signifies acknowledgment and acceptance of the changes. If a User disagrees with the changes, they are required to delete their account from the Service or unsubscribe from the Newsletter.
- Any changes to the Privacy Policy will be published on this subpage of the Service.
- The changes take effect immediately upon publication.

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