

TALKIE SERVICE PRIVACY POLICY

This Privacy Policy is a document related to the Terms and Conditions of the Talkie Service („Terms and conditions"). Definitions of terms used in this Privacy Policy are presented in Terms and Conditions. The provisions of the Regulations shall be applied accordingly.

This policy is informative and meets the information obligations imposed on the administrator of data by the OWF, i.e. Regulation 2016/679 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 the repeal of Directive 95/46/EC.

1. THE ADMINISTRATOR OF PERSONAL DATA

- 1.1. The administrator of personal data of users of the Talkie Service (Users) is PRAGMATISTS Sp. z o. o. Sp.K. with its registered office at Wróbla Street 10/2, 02-736 Warsaw, entered in the National Court Register under the number the register of entrepreneurs of the National Court Register kept by the District Court in Warsaw, XIII Commercial Division of the National Court Register, under the number KRS 0000367700, NIP 5213582885, REGON 0000367700 (Service Provider).
- 1.2. Contact with the Administrator of personal data may take place in particular by e-mail by email address contact@talkie.ai

2. THE METHOD OF PROCESSING DATA

- 2.1. The purpose and scope of the personal data to be processed shall be determined by the scope of the consents and of the completed data sent using the appropriate form. Processing of personal data of Users refers to the name, telephone number, e-mail address, IP address of the computer and data the data collected by Google Analytics and other data necessary for the performance of the services provided in accordance with the Regulations. Nature of services provided by the Service Provider prevents them from being provided anonymously
- 2.2. Personal data of Users will be processed for the purpose: (a) implementation of the law, (b) providing Services, including answering User inquiries and executing agreements on rendering services by electronic means through the Talkie Service and processing (c) promotional and commercial activities conducted by the Service Provider
- 2.3. Providing personal data is voluntary, but not consenting to the processing of personal data those marked as obligatory in the form will make it impossible to perform services and contracts by the Service Provider.
- 2.4. The legal basis for the processing of personal data in the case referred to above in paragraph 2.2(a), authorise the processing of data necessary for the purpose of Legitimate action, but in the case referred to in paragraph 2.2(b) above is to perform a contract to which the data subject is party or to take action if requested the data subject prior to the conclusion of the contract, as well as the authorisation of the processing, where it is necessary for the purposes of the legitimate interests pursued by the Service Provider (The legitimate interest of the Service Provider is, inter alia, to answer the following questions inquiries from Users), and in the case referred to in paragraph 2.2(c) above - user consent.
- 2.5. In the event that the Service Provider becomes aware of the User's use of the following services not in accordance with the Regulations or the applicable regulations (unauthorized use), The Service Provider may process personal data of the User to the extent necessary to determine his or her area of responsibility.

- 2.6. Personal data of the User will be processed for a period of time appropriate for the purpose of proving a reply to or perform a contract for the provision of services by electronic means (the period of time for which a claim is subject to a limitation period) and after that period shall be removed, provided that they processing will not be necessary on any other legal basis.
- 2.7. The service provider shall not transfer the personal data to third countries.

3. PROFILING

- 3.1. The Service Provider will also perform profiling by analysing the behaviour of Users in the following ways within the Talkie Service. Such profiling will result in remarketing. The User can object to such profiling at any time by sending an e-mail to contact@talkie.ai.

4. THE RECIPIENTS OF THE DATA

- 4.1. The Service Provider may entrust the processing of personal data to third parties in order to perform the activities indicated in the Regulations and provide services to the User. Then the recipients your data, may be: the hosting provider for the Talkie Service, a company that provides technical support Talkie Service, CRM Provider.
- 4.2. Personal data collected by the Service Provider may also be made available: appropriate state authorities, upon their request, under relevant laws or regulations to persons and entities, in cases prescribed by law.
- 4.3. Each entity to which the Service Provider entrusts the processing of personal data of the User, in under the entrustment agreement, the processing of personal data (hereinafter referred to as the 'entrustment agreement') guarantee an adequate level of security and confidentiality of the data processing personal data. The entity processing personal data of the User on the basis of the entrustment agreement may process the User's personal data, through another entity, only into with the prior consent of the Service Provider.
- 4.4. Disclosure of personal data to unauthorised entities in accordance with this Policy may be made only with the prior consent of the User whose data is concern.

5. RIGHTS OF THE DATA SUBJECT

- 5.1. Every User has the right to: (a) deletion of personal data collected on the subject both from the system belonging to the Service Provider and from the databases of entities with which the Service Provider cooperates or cooperated, (b) limiting the processing of data, (c) the transfer of data personal data collected by the Service Provider on the User, including their receipt in structured form, (d) request from the Service Provider access to its personal data and correction (e) to object to the processing, (f) withdrawing the consent of the Service Provider at any time without affecting the lawfulness of the processing that has been carried out (g) filing a complaint with a supervisory authority against the Service Provider

6. OTHER DATA

- 6.1. The Talkie service may store http queries, therefore some information may be stored in the server log files, including the IP address of the computer from which the query was received, the name of the user station - identification performed by the http protocol, if possible, the date and system time of registration on the Talkie service website and the arrival of the query, the number of bytes sent by the server, the URL of the page previously visited by the user, if it was accessed via a link, information about the user's browser, information about errors that occurred during the execution of the http transaction. Logs can be collected as material for the proper administration of the Talk Service. Access to information shall be

granted only to persons authorised to administer the IT system. Files with logos can be analysed in order to compile traffic statistics on the Talkie website and on the following pages errors that occur. The summary of such information does not identify the User.

7. SAFETY AND SECURITY

- 7.1. The service provider shall apply technical and organisational measures ensuring the protection of the processed personal data appropriate to the risks and categories of data to be protected, and in particular, it shall technically and organisationally safeguard the data against being made available to persons unauthorized collection by an unauthorized person of processing in violation of the law and change, loss, damage or destruction, including the use of SSL certificates. Set of the collected personal data of the Users is stored on a secure server and the data also protect the internal procedures of the Service Provider with respect to data processing personal data and information security policy.
- 7.2. The service provider has also implemented appropriate technical and organisational measures, such as pseudonymisation, designed to effectively implement data protection principles such as data minimisation, and to provide the processing with the necessary safeguards to comply with requirements of the GDPR and to protect the rights of data subjects. The service provider shall implement all the necessary technical measures referred to in Articles 25, 30, 32 to 34, 35 to 39 of the GDPR to ensure an increased level of protection and security of the processing of the User's personal data.
- 7.3. At the same time, the Service Provider points out that the use of the Internet and services provided by the road the electronic system may be compromised by the entry of malware into the information system and equipment of the User, as well as by unauthorized access to User data, including personal data, by third parties. In order to minimize these Hazards, the user should apply appropriate technical protection, e.g. from the use of current anti-virus or user identification software on the Internet. For detailed and professional behavioural information security in the Internet, the Service Provider recommends their consultation with the entities specialised in this type of IT services.

8. COOKIES

- 8.1. For the proper functioning of the Talkie Service, the Service Provider uses the Cookies technology. Cookies are packages of information that are stored on a user's device through the Talkie Service, usually containing information that is consistent with the purpose of the file, by means of which the user uses the Talkie Service - typically: service address, date of placement, expiry date, unique number and additional information consistent with the purpose of the file.
- 8.2. Talkie uses two types of cookies: (a) session sessions, which are deleted permanently at the end of the User's browser session; (b) session sessions, which remain after the end of the User's browser session on the User's device, until they are deleted.
- 8.3. On the basis of cookies, both session and permanent, it is not possible to determine the identity of the User. The cookie mechanism does not allow the collection of any personal data.
- 8.4. Talkie Service Cookies are safe for the User's device, in particular, they do not allow viruses or other software to enter the device.
- 8.5. Files generated directly by the Service Provider cannot be read by other services. External Cookies (i.e. Cookies placed by entities cooperating with the Service Provider) may be read by an external server.

- 8.6. User can change cookie settings at any time by specifying the storage conditions, by setting their browser or by configuring the service. First of all, User may refuse to store Cookies on their device in accordance with the browser manufacturer's instructions, but this may result in some or all of the functions of the Service not being available.
- 8.7. The user can also delete the cookies stored on his device at any time, according to the instructions of the browser manufacturer.
- 8.8. The Service Provider uses its own Cookies for the following purposes: authentication of the User on the Talkie Service and maintenance of the User's session; configuration of the Talkie Service and adjustment of the Talkie Service to the preferences or behavior of the user; analysis and research of the audience, the number of clicks and paths of the page to improve the appearance and organization of the content on the page, the time spent on the page, the number and frequency of visitors to the Talkie Service, maintaining statistics on resellers.
- 8.9. The Service Provider uses External Cookies for the following purposes:

Cookies of the following Tools	Purpose
Google Analytics	Analysis of Users' behavior in the Talk Service
Twitter and Facebook	Analysis of Users' behavior in the Talk Service
Google Adwords	Promotional and marketing activities in the retargeting process
Livechat	Initiating a conversation using a chat after the User has performed a defined activity within the Talkie.ai Service

- 8.10. For details on how to use cookies, please refer to the settings of the browser used by the User.

9. FINAL CONSIDERATIONS

- 9.1. This Privacy Policy shall enter into force on 02.07.2018.