

## **PRIVACY POLICY**

Effective date: 01 .06. 2020

Defenselayers Sp. z o.o. is aware that protection of privacy is of most importance, which is why we established Privacy Protection to help protect users right to privacy. In addition to this Privacy Policy, we provide additional information about our privacy practices.

This Privacy Policy informs the user about Defenselayers Sp. z o.o. rules regarding the collection, use and disclosure of personal data when using the website and about the choices that the user has made in relation to this data. User data is used to provide and improve the website.

By using the website, the user agrees to collect and use the information in accordance with these rules. Unless otherwise specified in this Privacy Policy, terms used in this Privacy Policy have the same meaning as in the Terms of Use, available at <https://www.defenselayers.com>.

This Privacy Policy applies to cookies and website operated by Defenselayers Sp. z o.o. with its registered seat in Warsaw ul. Sabały 58 02-174 entered into the register of entrepreneurs of the National Court Register maintained by the District Court for the capital city of Warsaw in Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0000773769, NIP number 5252783671, REGON number 382838678 (hereinafter referred to as “Defenselayers”).

If you would like to contact with Defenselayers on matters related to processing of personal data, please:

- send e-mail message to the following address: [webmaster@defenselayers.com](mailto:webmaster@defenselayers.com);

- sent a letter to the following address: Defenselayers Sp. z o.o., ul. Sabaty 58, 02-174 Warsaw, Poland.

## 1. Definitions

- 1.1 **Website** - Website is the <https://www.defenselayers.com> website operated by Defenselayers.
- 1.2 **Personal Data** - Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

## 2. Types of Data Collected

- 2.1 When using the website, Defenselayers may ask the user to provide certain Personal Data which may be used to contact the user or to identify the user (for convenience, hereinafter referred to as “Personal Data”). Personal data may include, but is not limited to, such data:
- email address;
  - first name and last name;
  - phone number;
  - address, state, province, ZIP/postal code, city.
- 2.2 Defenselayers may obtain certain information about user from publicly or commercially available sources and from third parties who perform services for Defenselayers.

## 3. Cookies and Usage Data

- 3.1 Defenselayers may also collect information on how to access and use the website (for convenience, hereinafter referred to as “Use Data”). These data may include information such as the Internet protocol address of the user’s computer (e.g. IP address), browser type, browser version, website that the user visits, time and date of the visit, time spent on these websites, unique device identifiers and other diagnostic data.
- 3.2 Defenselayers uses cookies and similar tracking technologies to track activity on its website and stores certain information.
- 3.3 Cookies mean IT data, including but not limited to text files, stored in users’ end devices (such as a telephone or a computer) sent through websites. The cookie is stored in the user’s browser and allows the website or a third party to recognize the user and make the next visit easier and more useful. Cookies can be “basic” or “analytical”. The user may instruct their browser to reject all cookies or to indicate when a cookie is being sent. However, if a cookie is not accepted, the user may not be able to use certain parts of the website.
- 3.4 Defenselayers uses the collected data for various purposes:
- to provide and maintain the website;
  - to notify you about changes to the website;
  - to enable the user to participate in the interactive functions of Defenselayers website when the user decides to do it;
  - to provide customer service;
  - to collect analyses or valuable information that will allow us to improve Defenselayers services;
  - to enable Defenselayers to monitor the use of its website;
  - to detect, prevent and resolve technical problems.

## **4. Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

- 4.1 Defenselayers, which is the operator of website is the controller within the meaning of Regulation (EU) 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 (for convenience, hereinafter we shall use the abbreviation: “GDPR”) with regard to personal data of users who are natural persons. This means that Defenselayers determines the purposes and means of processing users’ personal data independently and on its own responsibility. Personal data mean any information that may identify user, such as name and surname, phone number, e-mail address and your shipping address to deliver items purchased by you on website.
- 4.2 The purpose of this Privacy Protection Policy is to determine the actions taken by Defenselayers related to the protection of processed personal data, including the data collected via website. All activities of the Defenselayers are subject to the regulations on personal data protection, e.g. the Personal Data Protection Act of 10 May 2018. (Journal of Laws 2018, item 1000). Defenselayers’s Privacy Policy is governed by Polish law and complies with GDPR.
- 4.3 If you are from the European Economic Area (EEA), the legal basis on which Defenselayers collects and uses the personal data described in this Privacy Policy depends on the personal data collected by the Defenselayers and the specific context in which the Defenselayers collects it.
- 4.4 In accordance with the GDPR, Defenselayers may process personal data if there is the appropriate legal basis. The processing by Defenselayers of

personal data is processed in accordance with this Privacy Policy, takes place on the following legal bases:

- The Defenselayers must perform a contract with the user.

If you are our client, the processing of your personal data is necessary to perform our obligations under the contract. This applies, in particular, but not limited to creating and managing accounts, solving technical problems, processing your inquiries or other types of messages concerning directly services provided by us. We can also process your personal data for the purpose of handling our receivables and pursuing claims.

- The user gave the Defenselayers permission to do so.

In some cases, if Defenselayers wish to process your personal data, and cannot apply any other legal bases, Defenselayers may ask you to grant us consent to process your personal data for a specific purpose. In such case, you will be able to withdraw it at any time by contacting us. Withdrawal of consent will not affect the lawfulness of the processing that has been made on the basis of consent before its withdrawal.

- The processing of data is in the legitimate interest of the Defenselayers and does not override the rights of the user.

Defenselayers may process personal data in the event it is in our legitimate interest related to our business activity, unless your interests override ours. This applies in particular, but not limited to monitoring of our relationships with users, conducting users satisfaction surveys, preparing sales statistics, monitoring client experience on our website. If you are not a client, we have a legitimate interest in processing your personal data in order to create and manage accounts, solve technical problems, or process inquiries or other

types of messages related to the services we provide directly, as well as entering into or performance of the contract, including direct execution of orders, in particular, but not limited to their dispatch.

- Legal obligation

It occurs when we are required to process your personal data in order to fulfil a legal obligation, such as keeping records for tax purposes, issuing invoices or providing information to a public authority or law enforcement authority.

## **5. Retention of Data**

5.1 Defenselayers will store your personal data during business relationship and up to 3 years after your last contact or order with us, unless the applicable provisions stipulate the obligation to store personal data longer. Your personal data contained in cookies will be stored for a period of time corresponding to the cookie "lifespan" (up to 6 months) or until you delete them.

5.2 In the event that the basis for the processing of your personal data is our legitimate interest, we will process your personal data for the purpose of pursuing this interest until it ceases or you raise an objection in a situation where your interests or fundamental rights and freedoms override our legitimate interest. In the event you object to the processing of your personal data for direct marketing purposes, we will not be able to process it for such purposes.

5.3 In the event that the basis for the processing of your personal data for specified purpose is your consent, we will process your personal data for this purpose until you withdraw your consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- 5.4 Defenselayers will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of website, or Defenselayers is legally obligated to retain this data for longer periods.

## **6. Transfer of Data**

- 6.1 Information about the user, including personal data, may be transferred to and stored on computers located outside of the user's state, province, country or other governmental jurisdiction, where data protection laws may differ from those of that jurisdiction.
- 6.2 If the user is located outside of Poland and chooses to provide the Defenselayers with information, please note that data, including Personal Data, is transferred to and processed in Poland.
- 6.3 Consent to this Privacy Policy, followed by the transfer of such information, indicates user's consent to such transfer.
- 6.4 Defenselayers will take all necessary steps to ensure that user data is treated securely and in accordance with this Privacy Policy and there will be no transfer of user's personal data to an organization or country unless there are adequate controls, including data security and other personal data of user (for more information, see the website: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en) ).
- 6.5 If the processing involves the transfer of personal data to a country outside the EEA, which has not been regarded as ensuring an adequate level of protection

through the European Commission's decision, Defenselayers is obliged to secure such transfer including safeguards specified in art. 46-49 of the GDPR, in particular, but not limited to:

- Standard contractual clauses approved by the European Commission (such as standard contractual clauses for data controllers 2004/915/EC or standard contractual clauses for Processors 2010/87/EU or any subsequent version);
- Binding corporate rules, if applicable, and the entities to which the transfer is planned have adopted binding corporate rules approved by the relevant supervisory body.

## **7. Disclosure of Data**

7.1 In certain circumstances Defenselayers may be obliged to disclose the user's personal data if required by law or in response to important requests from public authorities (e.g. court or government agency).

7.2 Defenselayers may disclose user's Personal Data in the good faith belief that such action is necessary to:

- to comply with a legal obligation;
- to protect and defend the rights or property of Defenselayers;
- to prevent or investigate possible wrongdoing in connection with the website;
- to protect the personal safety of users of the Service or the public;
- to protect against legal liability.

## **8. Security of Data**



8.1 The security of user's data is important to Defenselayers but user has to remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While the Defenselayers strive to use commercially acceptable means to protect user's Personal Data, Defenselayers cannot guarantee its absolute security.

## **9. User Data Protection Rights under the General Data Protection Regulation (GDPR)**

9.1 In certain circumstances the user has the following rights to the protection of personal data:

- The right to access, update or delete information that the Defenselayers has about the user. Whenever possible, the user may access, update or request the deletion of his Personal Data directly in the account settings section. If the user is unable to do so on his or her own, the user must contact the Defenselayers for assistance.
- The right to correct the Data. The User has the right to correct his or her Personal Data if it is inaccurate or incomplete.
- Right to object. The user has the right to object to the processing of his/her personal data by the Defenselayers.
- The right to limit. The user has the right to demand that the Defenselayers limits the processing of his/her personal data.
- Right to data transfer. The user has the right to receive a copy of the information that the Defenselayers has about him/her in a structured, machine-readable and commonly used format.
- The right to withdraw consent. The user also has the right to withdraw his consent at any time when Defenselayers relied on his consent to process his personal data.

- 9.2 If the user wants to exercise his rights, express concerns, ask a question, make a complaint, or obtain additional information regarding the processing of personal data by Defenselayers, you can send an email on the following address: [webmaster@defenselayers.com](mailto:webmaster@defenselayers.com).
- 9.3 Defenselayers hereby obliges to respond to your request within one month, and in the case of complexity of the application or a large number of applications, up to 3 months. Please note that the Defenselayers may ask for verification of your identity before responding to such requests.
- 9.4 The user has the right to lodge a complaint with the Data Protection Authority about the Defenselayers's collection and use of the user's personal data. Please contact your local data protection authority in the European Economic Area (EEA) for more information.

## **10. Service Providers**

- 10.1 Defenselayers may employ third party companies and individuals to facilitate the website (hereinafter referred to as: "Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how the website is used.
- 9.5 These third parties have access to user's Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- 9.6 Therefore, Defenselayers may share personal data with certain categories of Service Providers, including:
- our affiliates and subsidiaries;

- professional services organizations, such as auditors and law firms;
- data analytics providers.

## **11. Analytics**

- 11.1 The Defenselayers may use third-party Service Providers to monitor and analyze the use of the website.
- 11.2 Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of the website. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.
- 11.3 The user can opt-out of having made his activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.
- 11.4 For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

## **12. Links to Other Sites**

- 12.1 The Defenselayers's website may contain links to other websites that are not operated by the Defenselayers. If the user clicks on a third party link, it will be directed to that third party's website. The Defenselayers strongly recommends that users review the privacy policy of each website they visit.

12.2 The Defenseayers has no control over and is not responsible for the content, privacy policy or practices of any third party sites or services.

### **13. Children's privacy**

13.1 Defenseayers understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

### **14. Changes to this Privacy Policy**

14.1 Defenseayers may update its Privacy Policy from time to time. It will inform its users about any changes by publishing a new Privacy Policy on this website.

14.2 The Defenseayers will notify you by e-mail and/or visible notice on the website before the change takes effect and update the "effective date" at the top of this Privacy Policy.

14.3 It is recommended that users periodically review this Privacy Policy for any changes. Changes to this Privacy Policy are effective from the time they are posted on this website.