

POLICY OF PRIVACY

For Users of HINTO Service

1. Preliminary terms

1. This Policy of Privacy provides the position of Paweł Poleński, conducting business under company name Space Digital Group Sp. Z o.o. ul. Wyrzykowskiego 5a/30 Warszawa 03-142 TAX ID: 5242840752 (hereinafter the Operator) regarding the rules for processing of personal data of HINTO Service Users.
2. If the Policy of Privacy does not stipulate otherwise, the definitions and terms used in the Policy of Privacy have the wording and meaning given in the Terms for HINTO Service Users.
3. The definitions used in this Policy of Privacy have the following meaning:
 - a. GDPR – Regulation by the European Parliament and Council (EU) 2016/679 of 27 April 2016 regarding protection of natural persons in relation to processing of personal data and free flow of this data and cancellation of the Directive 95/46/WE (General Data Protection Regulation).
 - b. Personal Data Protection Act of 10 May 2018 (JoL of 2018, item 1000).
 - c. Third parties – (under GDPR, the recipients to whom personal data are shared), legal persons and natural persons co-operating with the Operator in B2B in respect of mutual provision of services.
 - d. Processor – processing entity pursuant to art. 28 of GDPR who on the Operator's order participates in processing of personal data;
 - e. Administrator - conducting business under company name Space Digital Group Sp. Z o.o. ul. Wyrzykowskiego 5a/30 Warszawa 03-142 TAX ID: 5242840752

2 Data Administrator's obligation to inform

1. The administrator of personal data of HINTO Service Users (hereinafter Users collectively and User, individually), provided within the process of User's account creation is Paweł Poleński conducting business under company name Space Digital Group Sp. Z o.o. ul. Wyrzykowskiego 5a/30 Warszawa 03-142 TAX ID: 5242840752.
2. The Operator processes the following Users' personal data: name, surname, e-mail, nickname, account registration date, log-in time and session duration, and additionally, for the Users who report a complaint, its date and issue and the User's contact date, and for the Users who cancel their accounts – cancellation date and the contact data. We advise that the scope of data being processed may be changed in relation to the scope of provided services.
3. Processing of Users' personal data is done according to the terms of the Regulation by the European Parliament and Council (EU) 2016/679 of 27 April 2016 regarding protection of natural persons in relation to processing of personal data and free flow of this data and cancellation of the Directive 95/46/WE (General Data Protection Regulation), hereinafter GDPR.
4. The personal data provided by the User is or may be processed to:
 - a. Allow the User to use HINTO Service – the legal basis for personal data processing is art. 6 par. 1 b) of GDPR (processing is necessary for the contract whose party is a person the

- data concerns to or to take steps at the request of a person whom data concerns before the contract is concluded);
- b. Send to the User by e-mail to the User's e-mail, messages regarding new tips for football sports events under the HINTO Service. The legal basis for data processing is art. 6 par. 1 a) or the consent of a person whom data concerns;
 - c. Send marketing information to the Users in relation to own products and services by e-mail. The legal basis for data processing for marketing purposes is art. 6 par. 1 f) or the legally justified Administrator's interest (User's approval of Terms of Service as a form of conclusion of the Agreement);
 - d. Personal data provided by the User may be also processed to determine, pursue or defend against claims, if such claims concern the services provided by the Operator under the Terms of Service. The legal basis for data processing for marketing purposes is art. 6 par. 1 f) or the legally justified Administrator's interest (User's approval of Terms of Service as a form of conclusion of the Agreement); and art. 6 par. 1 c), that is legal regulations.
5. Considering that the Operator may process personal data of its Users for purposes specified in par. 4 above, we advise that the Users' personal data may be disclosed to data recipients and third parties based on art. 28 of GDPR.
 6. Users' personal data will be stored for the following time:
 - a. In relation to data processed to allow the Users to use HINTO Service – until removal of user's account;
 - b. In relation to data processed for purposes of sending to the User to the e-mail address provided by the User, of messages on the new tips for football sports events – until the User withdraws its consent;
 - c. For sending marketing information to the Users in relation to own products and services by e-mail – until objection is made by the User;
 - d. to determine, pursue or defend against claims, if such claims concern the services provided by the Operator under the Terms of Service, until expiration of such claims based on the applicable provisions of law.
 7. In case of processing of personal data based on the User's consent, any consents given by the User to process its personal data may be withdrawn at any time without any effect on the compliance with processing law, which was done based on the consent before it is withdrawn.
 8. The User may also demand from the Data Administrator, to access, correct, remove, limit processing thereof, object against processing of its data and transfer the data.
 9. A person whose personal data is processed, is entitled to file a complaint in respect of data processing to the Supervisory Body, which is the President of the Personal Data Protection Office in Warsaw, ul. Stawki 2, 00-193 Warsaw.
 10. Providing its personal data by the User is voluntary but required by the contract and a condition to enter into the services agreement consisting in allowing the User to use the HINTO Service. Failure to provide its data by the User will make it impossible to access the HINTO Service and the User will not be sent any messages regarding new tips of football sports events within the Service.
 11. The Users are not subjected to automated decision making specified in art. 22 of GDPR.

12. Be advised that for statistical reasons and in order to optimize the Service operation, the Operator uses the services of the supplier seated within the so-called third state, that is outside the European Economic Area – Google Analytics (the information on the principles of operation are available here: www.google.com/analytics/terms/pl.html.)
13. The Administrator will use its best effort to protect privacy and information regarding the Users. The Administrator, with due care, selects and uses proper technical means, including organizational and programming means that will allow to ensure protection of processed data. The Administrator in particular, secures data against disclosure, damage, loss and sharing to any unauthorized persons as well as against any unauthorized modification and processing with violation of applicable laws.

3 Information regarding Cookies

1. The Operator, via the Service, uses cookies, that is IT data, small text files, saved and stored on devices through which the User uses the HINTO Service.
2. The Information collected based on Cookies are used to optimize the HINTO Service and for statistical reasons.
3. The solutions used within the Service are safe for Users who use the Platform.
4. The Operator uses two types of Cookies:
 - a. Session cookies – files that are stored on User's devices and are kept until the browser session is closed. The saved information is then permanently removed from the Device's memory. The mechanism prevents collection of any personal data or discrete information from the User's device.
 - b. Permanent cookies - files that are stored on User's devices and are kept until they are deleted. Closing browser session or turning off the Device will not remove them. The mechanism prevents collection of any personal data or discrete information from the User's device.
5. The User may at any time change its browser settings to block cookies or be advised on saving cookies on its device. Other available options can be checked in the browser settings. Be advised that most browsers by default accept cookies on User's end device.
6. The User acknowledges that any changes made to the User's web browser may limit access to some of the Service's functions.
7. The Information regarding web browser settings is available in the browser menu or on websites of their providers.