

PRIVACY POLICY OF THE PROJECT 481 PLATFORM FOR THE "17 SDG"

This Privacy Policy (hereinafter: the "**Policy**") contains information on the processing of your personal data in connection with your use of the **Project 481 for the "17 SDG"** online Platform, operating at the web address <https://17celow.lazarski.projekt481.pl> (hereinafter: the "**Platform**").

Controller of personal data

The controller of your personal data is SYMULATOR BIZNESU SPÓŁKA JAWNA ANNA BŁOŃSKA MICHAŁ BŁOŃSKI (a Polish general partnership) with its registered office in Gdańsk (registered address: ul. Majora Hubala 12, 80-289 Gdańsk), entered in the register of entrepreneurs of the National Court Register kept by the District Court Gdańsk-Północ in Gdańsk, 7th Commercial Division of the National Court Register, under KRS number: 0000567687, holding Tax Identification Number (NIP): 5842477610 and statistical number (REGON): 192807989 (hereinafter: the "**Controller**").

Contacting the Controller

In all matters relating to the processing of personal data, you may contact the Controller by e-mail at: biuro@symulator-biznesu.pl

Personal data protection measures

The Controller applies modern organisational and technical safeguards in order to ensure the best possible protection of your personal data, and guarantees that it processes such data in accordance with 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) (hereinafter: the "**GDPR**"), the Polish Act of 10 May 2018 on the Protection of Personal Data, and other personal data protection legislation.

Information on the personal data processed

Using the Platform requires the processing of your personal data. Below you will find detailed information on the purposes of and the legal bases for the processing, as well as on the processing period and on whether providing the data is mandatory or voluntary.

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Agreement for the provision of the Account Service	1) first name and surname; 2) personal data contained in the Account login.	Article 6(1)(b) GDPR (processing is necessary for the performance of the Agreement for the provision of the Account Service concluded with the data subject, or in order to take steps at the data subject's request prior to entering into it)
Providing the above personal data is a condition for concluding and performing the agreement for the provision of the Account Service (providing it is voluntary, but the consequence of not		

Purpose of processing	Personal data processed	Legal basis
providing it will be the impossibility of concluding and performing that agreement, including creating an Account). The Controller will process the above personal data until the claims arising from the Agreement for the provision of the Account Service become time-barred.		

Purpose of processing	Personal data processed	Legal basis
Sending e-mail notifications	e-mail address	Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by the Controller, in this case informing Users about actions taken in connection with the performance of Agreements concluded with Users)
Providing the above personal data is voluntary but necessary in order to receive information about actions related to the performance of Agreements concluded with Users (the consequence of not providing it will be the impossibility of receiving such information). The Controller will process the above personal data until an effective objection is raised or the purpose of the processing is achieved (whichever occurs first).		

Purpose of processing	Personal data processed	Legal basis
Handling enquiries submitted by Users	1) first name 2) e-mail address 3) other data contained in the message sent to the Controller	Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by the Controller, in this case replying to the enquiry received)
Providing the above personal data is voluntary but necessary in order to receive a reply to the enquiry (the consequence of not providing it will be the impossibility of receiving a reply). The Controller will process the above personal data until an effective objection is raised or the purpose of the processing is achieved (whichever occurs first).		

Purpose of processing	Personal data processed	Legal basis
Fulfilment of obligations relating	1) first name and surname	Article 6(1)(c) GDPR

Purpose of processing	Personal data processed	Legal basis
to the protection of personal data	2) the contact details you provide (e-mail address; correspondence address; telephone number)	(processing is necessary for compliance with a legal obligation to which the Controller is subject, in this case obligations arising from personal data protection legislation)
Providing the above personal data is voluntary but necessary for the Controller to properly fulfil its obligations arising from personal data protection legislation, including the exercise of the rights granted to you by the GDPR (the consequence of not providing such data will be the impossibility of properly exercising those rights). The Controller will process the above personal data until the limitation periods expire for claims arising from an infringement of personal data protection legislation.		

Purpose of processing	Personal data processed	Legal basis
Analysis of your activity on the Platform	1) date and time of the visit 2) device IP number 3) type of the device's operating system 4) approximate location 5) type of web browser 6) time spent on the Platform	Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by the Controller, in this case obtaining information about your activity on the Platform)
Providing the above personal data is voluntary but necessary for the Controller to obtain information about your activity on the Platform (the consequence of not providing it will be the impossibility of the Controller obtaining such information). The Controller will process the above personal data until an effective objection is raised or the purpose of the processing is achieved.		

Purpose of processing	Personal data processed	Legal basis
Administration of the Platform	1) IP address 2) server date and time 3) information about the web browser 4) information about the operating system The above data is recorded automatically in so-called server	Article 6(1)(f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by the Controller, in this case ensuring the proper functioning of the Platform)

Purpose of processing	Personal data processed	Legal basis
	logs each time the Platform is used (administering the Platform without server logs and automatic recording would not be possible).	
Providing the above personal data is voluntary but necessary in order to ensure the proper functioning of the Platform (the consequence of not providing it will be the impossibility of ensuring that the Platform functions properly). The Controller will process the above personal data until an effective objection is raised or the purpose of the processing is achieved.		

Profiling

In order to create your profile for marketing purposes and to send you direct marketing tailored to your preferences, the Controller will process your personal data by automated means, including profiling it – this will not, however, produce any legal effects concerning you or similarly significantly affect you.

The scope of the profiled personal data corresponds to the scope indicated above in relation to the analysis of your activity on the Platform and to the data you save in your Account.

The legal basis for processing personal data for the above purpose is Article 6(1)(f) GDPR, under which the Controller may process personal data for the purposes of its legitimate interests, in this case carrying out marketing activities tailored to the preferences of the recipients. Providing the above personal data is voluntary but necessary in order to achieve that purpose (the consequence of not providing it will be the impossibility of the Controller carrying out marketing activities tailored to the recipients' preferences).

The Controller will process personal data for the purpose of profiling until an effective objection is raised or the purpose of the processing is achieved.

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Controller:

- a) the hosting company;
- b) the company providing legal services;
- c) the supplier of the system for voice input of the content available on the Platform;
- d) the supplier of the systems for analysing traffic and activity on the Platform (Google Analytics).

In addition, personal data may also be disclosed to public or private entities where such an obligation arises from generally applicable laws, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the Controller's use of services provided by, among others, Google LLC, your personal data may be transferred to the following third countries: the United Kingdom, Canada, the

USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for transferring data to the above third countries is:

- in the case of the United Kingdom, Canada, Israel, Japan and South Korea – European Commission decisions finding an adequate level of personal data protection in each of the above third countries;
- in the case of the USA – Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, finding an adequate level of protection of personal data under the EU-U.S. Data Privacy Framework;
- in the case of Chile, Brazil, Saudi Arabia, Qatar, India, China, Singapore, Taiwan (Republic of China), Indonesia and Australia – contractual clauses ensuring an adequate level of protection, consistent with the standard contractual clauses set out in Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

You may obtain from the Controller a copy of the data transferred to a third country.

Your rights

In connection with the processing of personal data, you have the following rights:

- 1) the right to be informed what personal data concerning you is processed by the Controller and to receive a copy of that data (the so-called right of access). The first copy of the data is provided free of charge; the Controller may charge a fee for further copies;
- 2) if the data processed becomes out of date or incomplete (or otherwise incorrect), you have the right to request its rectification;
- 3) in certain situations you may ask the Controller to erase your personal data, for example where:
 - a. the Controller no longer needs the data for the purposes of which it informed you;
 - b. you have effectively withdrawn your consent to the processing – provided that the Controller is not entitled to process the data on another legal basis;
 - c. the processing is unlawful;
 - d. the need to erase the data results from a legal obligation to which the Controller is subject;
- 4) where personal data is processed by the Controller on the basis of consent given or in order to perform an Agreement concluded with the Controller, you have the right to transfer your data to another controller;
- 5) where personal data is processed by the Controller on the basis of the consent you have given, you have the right to withdraw that consent at any time (withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal);
- 6) if you consider that the personal data processed is incorrect, that its processing is unlawful, or that the Controller no longer needs certain data, you may request that, for a specified necessary period (e.g. to verify the accuracy of the data or to pursue claims), the Controller carries out no operations on the data and merely stores it;

- 7) you have the right to object to the processing of personal data where the basis for the processing is the Controller's legitimate interest. If an objection is effectively raised, the Controller will cease processing the personal data for that purpose;
- 8) you have the right to lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) if you consider that the processing of personal data infringes the GDPR.

Cookies

1. The Controller informs you that the Platform uses "cookies", which are installed on your terminal device. These are small text files which may be read by the Controller's system, as well as by systems belonging to other entities whose services the Controller uses.
2. The Controller uses cookies for the following purposes:
 - a. ensuring the proper functioning of the Platform – thanks to cookies, the Platform can operate efficiently, its functions can be used and it is possible to move conveniently between individual subpages;
 - b. improving the comfort of browsing the Platform – thanks to cookies, it is possible to detect errors on certain subpages and to improve them on an ongoing basis;
 - c. compiling statistics – cookies are used to analyse how users use the Platform. This makes it possible to continuously improve the Platform and adapt its operation to users' preferences;
 - d. carrying out marketing activities – thanks to cookies, the Controller can direct advertising tailored to users' preferences to them.
3. The Controller may place both persistent and temporary (session) files on your device. Session files are usually deleted when the browser is closed, whereas closing the browser does not delete persistent files.
4. Information about the cookies used by the Controller is displayed in a panel at the bottom of the Platform's website. Depending on your decision, you may enable or disable cookies of individual categories (with the exception of necessary cookies) and change these settings at any time.
5. The data collected by means of cookies does not allow the Controller to identify you.
6. Using most commonly used browsers, you can check whether cookies have been installed on your terminal device, as well as delete installed cookies and block their installation by the Platform in the future. Disabling or restricting cookies may, however, cause considerable difficulties in using the Platform, for example the need to log in on every subpage, longer loading times for the Platform's pages, or restrictions on the use of certain functionalities.

Final provisions

In matters not regulated by the Policy, generally applicable personal data protection legislation shall apply.

The Policy is effective as of 27 July 2026.