



## PRIVACY POLICY FOR DOCSQUALITY

This Privacy Policy governs basic issues of privacy and personal data protection processed in a process of using DocsQuality Application within the Webservice, including basic principles of using cookies files on the website at the address of <https://docsquality.com>

This Privacy Policy constitutes the performance of the information obligation arising under the art. 13 (*when personal data are collected from the data subject*) and art. 14 (when personal data have not been obtain from the data subject) of the of the 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, further referred to as the or “**GDPR**”)

### 1. DEFINITIONS

As a part of further provisions, the following understanding of the terms should be adopted:

- **Data Controller/ Webservice Provider** – means the company of **Inero Software Sp. z o.o.** (Ltd.) seated in Gdańsk (80-172), at Trzy Lipy 3 Street, registered under the number (KRS no.) 0000704853 within National Court Register, held by Regional Court for Gdańsk-Północ in Gdańsk, VII Commercial Division of National Court Register, share capital amounting to 6650,00 PLN, fully paid, having VAT no. (NIP): 5833272707 and statistic number (REGON): 368800280, providing services electronically by means of access to a software of DocsQuality Application, generally through Webpage, and for that reason collecting and storing personal information of the User (or User’s Device).

In all matters related to this Policy or providing Services or running Website/Webservice the Service Provider is to be contacted via e-mail address to is: [support@docsquality.com](mailto:support@docsquality.com) or in written form at the address of its registered seat provided above.

- **DocsQuality Application (Application)** – means a software solution made accessible be the Service Provider, allowing to verify the quality (readability) of electronic documents automatically, by using methods of machine learning and AI to detect unreadable content and obscuration of electronic (or digitalized paper) documents.
- **Cookie files (Cookies)** – means information stored in text form sent by the server and saved on the user’s terminal device (like computer, mobile phone, tablet) while visiting websites, including Webservice,
- **Personal Data** – means any information relating to an identified or identifiable natural person (“data subject”), directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (IP) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, especially information collected by cookies files or technology alike;



- **Client** – means an entity (natural or legal person, or organizational unit without legal personality but with legal capacity), who by entering an agreement with Service Provider to have access to use the Application and made it available to its Users;
- **Webservice** – means a solution of service providing through the webpage <https://docsquality.com>, by accessing to and allowing to use the Application (by functionalities currently available) on the User's Device;
- **Webpage** - an internet domain at the address of <https://docsquality.com>;
- **Third Party Providers** – mean legal entities providing service to the Data Controller in relation the Webservice operations or while giving access to use the Application by Users, to whom the processing of Personal Data is to be carried out on behalf of the Data Controller when necessary and according to the law, in case legal requirements are to be met as provided in article 28 of GDPR;
- **Service** – mean providing on-line access to DocsQuality Application by the Service Provider according to the Polish legal Act on electronic provision of services (Official Journal of 2019, issue 123), including the assistance of the Third Parties Providers, through available interaction of a User with the Webpage or by the Webservice;
- **Device** – means electronic device with the software by which the User may access and use the Application or Webservice ( e.g. computer, tablet, smartphone);
- **User** – means any person who uses the Webpage or remains recipient of the Service provided electronically by the Webpage or through the Webservice;

## 2. RULES ON PIVACY PROTECTION AND PROCESSING PERSONAL DATA

### 1) WHICH PERSONAL DATA ARE TO BE COLLECTED:

While using the Service or connecting by Webservice, the User may transfer some of the Personal Data of the following type:

- a. name and surname
- b. e-mail address
- c. mobile phone number
- d. data for settlement of payments – Client's data to execute payment obligation for the Service, e.g. tax ID number (VAT ID) or the address of Client's registered office;
- e. usage data in relations to Webpage – so as IP or other identifiers and information collected by those, including Cookies or other technologies alike, while using the Webservice or visiting Webpage, that may constitute Personal Data;

Data of the User visiting the Webpage are collected automatically and contain mainly statistic (anonymous) data referred to the User activity on the Webpage.

### 2) WHAT IS THE PURPOSE AND LEGAL BASIS OF PROCESSING YOUR DATA

Personal Data are to be processed based on the following principles:



- a. in case a data subject is a Client – the legal basis for processing personal data is necessity for performance of a contract to which the data subject is a party, or in order to take steps prior to entering into such contract (art. 6 p. 1 lit. (b) of GDPR), or necessity for compliance with legal obligation to which the Data Controller is subject (art. 6 p. 1 lit. (c) of GDPR);
- b. in case a data subject is transferring Personal Data to contact with Data Controller or to receive further information about the Service, including information on promotions or special offers of Service - the legal basis for processing personal data is necessity for the purpose of the legitimate interests pursued by the Data Controller in a form of delivering information on the offers of interest (art. 6 p. 1 lit. (f) of GDPR), or the necessity for taking other steps at the request of the data subject (art. 6 p. 1 lit. (b) of GDPR), or explicit consent to the processing of Personal Data given by data subject (art. 6 p. 1 lit. (a) of GDPR), which can be withdrawn at any time;
- c. in case a data subject is using the Webpage, in particular when consent for Cookies (other than necessary) has been given, for purpose of learning on preferences and opinions on using the Application, or developing the Service - the legal basis for processing personal data is necessity for the purpose of the legitimate interests pursued by the Data Controller in a form of analyzing the activities of Users under the Webpage and possible adjustments or development of Service (art. 6 p. 1 lit. (f) of GDPR)
- d. in case Cookies are in question, mainly for the purpose of statistic and analytic activities of the Data Controller - the legal basis for processing personal data is necessity for the purpose of the legitimate interests pursued by the Data Controller in a form of analyzing the activities of Users under the Webpage and possible adjustments or development of Service (art. 6 p. 1 lit. (f) of GDPR);
- e. in case of using Personal Data for the purpose of ascertain, executing or defending rights of the Data Collector (pursuing claims) - the legal basis for processing personal data is necessity for the purpose of the legitimate interests pursued by the Data Controller in a form of protecting rights of the Data Controller, and processing and storing of those Personal Data will last no longer than the period of limitation of claims as the Data Controller may have (art. 6 p. 1 lit. (f) of GDPR);

In regard to Personal Data processing as mentioned in the sections a. - d. above, the processing and storing of the Personal Data will last only as long as needed, but no longer than 6 years.

### 3) DATA RECIPIENTS – FURTHER PROCESSING OF DATA

In circumstances justified by necessity of using the service of Third Parties Providers while providing Service, the Data Controller may transfer certain Personal Data as needed, making them recipients of Personal Data in order to letting them to perform services the Data Controller needs to provide service to the User, and such recipients may include :

- o entities carrying out service operational to our business activities – accounting and bookkeeping office, legal office, etc.



- external providers of on-line service being a part or conditional to providing access to the Application – those are to be informed at the occasion (moment) of using such service;

Apart from the Third Parties Providers certain Personal Data might be transferred in necessary scope to external entities only as according to the applicable legal regulation, and such recipients might be public bodies, like Police or Fiscal Administration or other public prosecutors in relation to the legal proceeding launched on certain legal basis.

#### 4) AUTOMATED DECISION-MAKING

The Data Controller is not performing any type of profiling or other automated making decisions.

#### 5) TRANSFERRING PERSONAL DATA TO COUNTRIES OUTSIDE EEA

None of the Personal Data shall be transferred by the Data Controller to countries outside EEA.

### 3. COOKIES POLICY

#### 1) PURPOSE AND RULES ON USING COOKIES

Cookie and other technologies alike are to be used for the following purposes:

- ensuring security and preventing abuse (preventing access by unauthorized third parties);
- customization of the content of webpages to preferences and user's device or optimization of the use of the web pages;
- facilitate logging in the Webservice account, including logging in through social media, and enabling convenient browsing by going through webpages without having to logging in at the each of the webpage;
- creating anonymous, aggregated statistics that allow to understand how users make use of webpage, which allows improving their structure and content;
- enabling webpages to be improved, including testing their performance or efficiency;
- identifying which ads were displayed by the user, as well as to display ads (on webpages of Service provider's or its partners) most relevant to the user's activity on the webpage.

#### 2) TYPE OF PERSONAL DATA PROCESSED IN RELATION TO COOKIES

The system used by the Data Collector may use three types of cookies:

- technical cookies necessary for proper functioning of the Webservice or Webpage
- analytical cookies for conducting research on website traffic



- marketing and advertising cookies (used only upon user explicit consent)

Cookies are gathered and stored on the User's Device for the prescribed period, e.g. permanent cookies files (with storage time from 1 day till 2 years) or temporary cookies files (session files with storage time limited to leaving the webpage or restarting).

More information on managing Cookies is available at following webpage:

- <https://support.mozilla.org/pl/kb/usuwanie-ciasteczek>
- <https://support.google.com/chrome/answer/95647>
- <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

In regard to marketing and advertisement Cookies

<i>Cookie</i>	<i>Internet Domain</i>	<i>Storage time</i>	<i>Usługa</i>
<i>Sesyjne</i>	www.facebook.com	Session	Facebook Pixel
<i>_fbp</i>	www.doscquality.com	3 months	Facebook Pixel
<i>_ga</i>	www.doscquality.com	2 lata	Google Analytics
<i>_gat</i>	www.doscquality.com	10 minutes	Google Analytics
<i>_gid</i>	www.doscquality.com	1 day	Google Analytics
<i>complianz_policy_id</i>	www.doscquality.com	12 months	Complianz
<i>complianz_consent_status</i>	www.doscquality.com	12 months	Complianz
<i>cmplz_marketing</i>	www.doscquality.com	12 months	Complianz
<i>cmplz_stats</i>	www.doscquality.com	12 months	Complianz
<i>ls_smartpush</i>	www.Doscquality.com	3 months	Lite Speed

Google Analytics

- <https://marketingplatform.google.com/about/analytics/terms/us/>
- <https://policies.google.com/privacy?hl=en-US>
- <https://www.facebook.com/about/privacy>

Facebook:



- <https://www.facebook.com/policies/cookies/>

### 3) DETAILED PURPOSE TO WHICH PERSONAL DATA ARE TO BE PROCESSED VIA COOKIES

The data controller will process personal data for the following purposes:

- Analysis of traffic and interaction on the website (analytical data)
- Presentation of online media and interactive content placed on the website (content presentation)
- Maintain information about individual settings related to the website (configuration and preference management)

### 4) PROCESSING PERIOD FOR PERSONAL DATA PROCESSED VIA COOKIES

Personal Data of the data subject will only be kept for a limited time, i.e. till the manually deletion of cookies or until the expiration of the storage time of Personal Data in the systems used by the Data Controller, however the maximum expected processing time for analytical data is 26 months .

## 4. DATA PROTECTION RIGHTS

The Data Controller herein informs that each data subject is empowered under legal regulation applicable in Polish law or EU law (including GDPR), as justified by circumstances, to several rights in relation to Personal Data, that includes in particular:

- 1) right to access your Personal Data, including right to make copies of such;
- 2) right to request rectification of your Personal Data;
- 3) right to erase your Personal Data;
- 4) right to limit processing on your Personal Data
- 5) right to withdrawal your consent - only in case of processing Personal Data based on given consent;
  - withdrawal of the consent for processing Personal Data may be performed through the link given in the e-mail correspondence sent to data subject, or any time by e-mail contact at the address: [support@docsquality.com](mailto:support@docsquality.com)

however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- 6) right to data portability of your Personal Data;
- 7) right to object to processing your Personal Data;

At any time the data subject assumes that the Data Controller infringe its right under the polish law, may lodge a complaint with a supervisory authority which is the President of the Office for Personal Data Protection. For more information visit webpage : <https://uodo.gov.pl/pl>.



In case of infringement of right on Personal Data of the data subject by the Data Controller, in regards to processing be means of electronic communication, a complaint may be lodged with a supervisory authority which is the President of the Office of Electronic Communication (at the address of the office: Giełdowa Str. 7/9, 01-211 Warsaw).

## 5. UPDATE OF PRIVACY POLICY

This Privacy policy comes into force on July 1, 2023.

In order to provide with the latest and actual information on processing Personal Data by the Data Controller, according to the GDPR requirements, this Privacy Policy may be a subject of the amendment.

The most current version of this Privacy Policy can always be available at the address of Webpage: <https://docsquality.com>.