

TRAVVIL
PRIVACY AND COOKIE POLICY

I. General provisions

1. Definitions of the terms used in this Privacy and Cookie Policy:

Personal Data Administrator - The Personal Data Administrator is STARTUPBASIS POLSKA Spółka z ograniczoną odpowiedzialnością with its registered office in Zielona Góra, ul. Bursztynowa 16, 65-012 Zielona Góra, entered into the register of entrepreneurs kept by the District Court for Zielona Góra, 8th Commercial Department of the National Court Register [Sąd Rejonowy w Zielonej Górze VIII Wydział Gospodarczy Krajowego Rejestru Sądowego] under the number KRS 0000827968, with share capital of PLN 6,700.00, paid in full.

Company - STARTUPBASIS POLSKA Spółka z ograniczoną odpowiedzialnością with its registered office in Zielona Góra, ul. Bursztynowa 16, 65-012 Zielona Góra, entered into the Register of Entrepreneurs kept by the District Court for Zielona Góra, 8th Commercial Department of the National Court Register [Sąd Rejonowy w Zielonej Górze VIII Wydział Gospodarczy Krajowego Rejestru Sądowego] under the number KRS 0000827968, with share capital of PLN 6,700.00, paid in full, providing its services i.e. via website and application.

Website - the website available at www.travvil.com run and owned by the Company.

Application - the Travvil application referred to on the Website, downloadable via Google Play and the App Store, developed and owned by the Company.

User - a natural person, legal person or organizational unit without legal personality, which is granted legal capacity by the law, who uses the website, application and / or services of the Company.

Personal Data – all information identifying or allowing the identification of a natural person, directly or indirectly, in particular on the basis of identifiers such as name and surname, name, address, location data, telephone number, e-mail address, tax identification number, PESEL (Polish Resident Identification Number), bank account number.

Newsletter - an electronic service provided by the Personal Data Administrator via e-mail, which allows all Users using it to periodically receive e-mails from the Personal Data Administrator which contain information on promotions and new products on the website, in the application and / or on services provided.

Privacy Policy - this Privacy and Cookie Policy.

2. This Privacy Policy sets out the cookie policy and the rules of privacy and of the processing and protection of Users' Personal Data in connection with their use of the website, of the application and / or of the services of the Company.
3. This Privacy Policy complies with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27/04/2016 on the protection of individuals 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) (Journal of Laws UE L 119, p. 1) ("GDPR") and the applicable provisions of national law in the field of personal data.
4. By using the website, the application and/or using the Company's services, the User agrees to this Privacy and Cookie Policy and its individual provisions, as well as to the use of cookies by the website.
5. In the case of using the contact form, as well as when downloading the application, the User is obliged to provide true Personal Data.

II. Types of Personal Data Processed

1. By using the Website, the IP number of the computer, tablet, cell phone or of another device connected to the Internet of the User can be processed.

2. In the case of using the contact form available on the website by the User, the following Personal Data of the user can be processed:
 - a. First name
 - b. Location (including country, street address, building)
 - c. E-mail address
3. When using the application and/or the services of the Company, the following Personal Data of the user can be processed:
 - a. First and last name / Name
 - b. Address
 - c. E-mail address
 - d. Phone number
 - e. Tax identification number / PESEL (Polish Resident Identification Number)
 - f. Bank account number
 - g. Other data provided by the User necessary for the correct provision of services.
4. By using the contact form and/or the application and/or the services of the Company, the User agrees to the processing of their Personal Data.

III. The purpose of Personal Data processing

The Personal Data of Users is processed in order to:

- a) Provide services by the Company to the User in a correct manner
- b) Fulfill the contracts concluded between the Company and the User
- c) Send the newsletter to the User
- d) Examine claims and complaints filed by the User

IV. Legal basis for the processing of Personal Data

1. The processing of Personal Data is performed 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) and in accordance with the Law of May 10, 2018 on the protection of personal data (Polish Journal of Laws of 2018, item 1000, as amended) and this Privacy Policy.
2. Providing Personal Data by the User is voluntary.
3. Providing Personal Data can be necessary to use the application and/or the services provided by the Company.
4. The processing of Personal Data by the Personal Data Administrator takes place on the basis of legal provisions and/or with consent of the User, respecting the rights of the person to whom they relate.
5. The user can withdraw their consent to process their Personal Data at any time. The withdrawal of the consent does not have an effect on the legal compliance of the processing of Personal Data which was performed based on the consent before it was withdrawn, nor does it have an effect on the processing of Personal Data based on any other legal basis than the consent of the User, if a different legal basis is in effect in this case.

V. Recipients of Personal Data

1. The Personal Data of Users mentioned in Section II above can be transmitted or shared by the Personal Data Administrator to employees and associates and to entities with which the Personal Data Administrator cooperates including entities engaged in remote customer support and mass mailing only to the extent necessary for the right provision of services.
2. The Personal Data of Users mentioned in Section II above can be transmitted or shared by the Personal Data Administrator to entities providing electronic payment services only to the extent necessary to perform the payment.
3. The Personal Data of Users mentioned in Section II above can be transmitted or shared by the Personal Data Administrator to entities providing legal support, accounting services, IT services and marketing services.
4. The transmission or sharing of the Personal Data of Users mentioned above takes place with respect to the rights of Users and in accordance with applicable law.

VI. Personal Data Protection Measures

1. The Personal Data Administrator protects the Personal Data of Users from unauthorized access by third parties and provides organizational and legal measures in accordance with applicable law which purpose is to guarantee the privacy of the Personal Data of Users and to ensure their processing takes place without access of unauthorized persons.
2. The Personal Data Administrator implements and applies appropriate technical solutions, in particular technical, IT and physical protection of Personal Data.

VII. Users' rights with regard to Personal Data

1. The User has the right to:
 - a. obtain from the Personal Data Administrator confirmation whether the Personal Data Administrator processes their Personal Data;
 - b. obtain access to their Personal Data
 - c. withdraw consent to process their Personal Data
 - d. demand from the Personal Data Administrator to correct, complete, delete or to restrict the processing of the Personal Data of the User
 - e. demand from the Personal Data Administrator restrict the processing of Personal Data if (1) the User is questioning the accuracy of Personal Data – for a period which allows the Personal Data Administrator to check the accuracy of this Data; (2) the processing does not comply with the law and the User does not agree for their Personal Data to be deleted and demands restricting of their processing instead; (3) the Personal Data Administrator does not need the Personal Data anymore in order to process them but the User needs them in order to establish, investigate or defend claims; (4) the User has objected in accordance with the applicable provisions against processing - until it is determined whether the legitimate grounds on the part of the Personal Data Administrator override the grounds for the User's objection.
 - f. Demand from the Personal data Administrator to immediately delete their Personal Data (the right to be forgotten), if one of the following occurs: (1) the Personal Data is no longer necessary for the purpose they were collected before or to be processed in any other way; (2)

the User withdrew their consent on which the processing is based and no other legal basis exists for the processing; (3) the User files an objection to the processing and the objection is backed by applicable law; (4) the Personal Data was unlawfully processed; (5) the Personal Data need to be deleted in order to fulfill the legal obligation provided for in the law of the European Union or the law of a member state to which the Personal Data Administrator is subject;

- g. File an objection regarding the processing of Personal Data
 - h. File a complaint to the supervisory body dealing with the protection of personal data, which is the President of the Office for Personal Data Protection.
2. The User has the right to withdraw their consent to the processing of Personal Data. The right to withdraw consent to the processing of Personal Data is possible at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. The consent may be withdrawn by sending a declaration of withdrawal of consent to the processing of Personal Data directly to the Personal Data Administrator.
 3. Withdrawal of consent to the processing of Personal Data may prevent the Company from providing services to the User.

VIII. Storage period of Personal Data

1. The User's Personal Data will be kept:
 - a) during the provision of services to the User,
 - b) when it is necessary for the performance of the contract and the implementation of other rights or obligations of the Personal Data Administrator in accordance with the law,
 - c) during the consideration of complaints or other claims submitted by the User,
 - d) until the expiry of the limitation of claims related to the concluded contract,
 - e) until the User withdraws his consent for further processing of their Personal Data.
2. After the expiry of the storage period of Personal Data, Personal Data will be deleted by the Personal Data Administrator.

IX. Changes to the Privacy Policy

1. The Personal Data Administrator reserves the right to change the Privacy Policy for an important reason, in particular, if necessary, to adapt the Privacy Policy to the law or to improve the quality of User service.
2. Users will be notified of any changes to the Privacy Policy by the Personal Data Administrator through the Website.
3. The amended Privacy Policy is binding on the User, unless the User declares to the Personal Data Administrator prior to the effective date of the amended Privacy Policy that they do not accept it.
4. Changes to the Privacy Policy do not affect the processing of Personal Data carried out beforehand.

X. Cookies

1. The Website uses cookies, i.e. IT data saved and stored on servers on the User's end device. Cookies are used to monitor and check how Users use the website and to help improve the functionality of the website and adapt it to the needs of Users.

2. The User may at any time change the cookie settings, in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform every time a cookie is saved in the User's device. The user may also delete cookies from his device after each visit to the website.
3. Restrictions on the use of cookies may make it difficult or impossible to use the website.

XI. Final Provisions

1. This Privacy Policy is valid from August 21, 2020.
2. All inquiries related to the processing and protection of Personal Data should be directed to the Personal Data Administrator in writing, by e-mail, by phone or in person:

Personal Data Administrator
STARTUPBASIS POLSKA sp. z o.o.
ul. Bursztynowa 16, 65-012 Zielona Góra
e-mail: contact@travvil.com