

AI SPRINTER PRIVACY POLICY

This Privacy Policy (hereinafter: "**Policy**") contains information on the processing of your personal data in connection with the use of the AI - Sprinter application ("**Application**").

Any capitalized terms not otherwise defined in the Policy shall have the meaning given to them in the Terms of Use, available at: <https://ai-sprinter.com>

Personal data Controller

The Controller of your personal data is **RB ALTUM GROUP limited liability company** with its registered office in Kraków (registered office address: Mała Góra 88 lok. 25, 30-864 Kraków), entered into the register of entrepreneurs of the National Court Register kept by the District Court for Kraków Śródmieście in Kraków, XI Commercial Division of the National Court Register under KRS number: 0000841700, TIN: 6793199754, REGON number: 386072842, having a share capital of PLN 5,000.00 (five thousand zlotys) paid in full ("**Controller**").

Contact with the Controller

In all matters related to the processing of personal data, you can contact the Controller via:

- 1) e-mail – at: aisprinter.office@gmail.com;
- 2) traditional post office – at the following address: Mała Góra 88 apt. 25, 30-864 Kraków;
- 3) phone number – at: 48 881 266 135.

Personal data protection measures

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

Information on the personal data processed

The use of the Application requires the processing of your personal data. Below you will find detailed information about the purposes and legal grounds of processing, as well as the period of processing and the obligation or voluntariness to provide them.

| Purpose of processing | Personal data processed | Legal basis |
|--|------------------------------|---|
| Conclusion and performance of the Account Service Agreement | 1) name 2) e-mail address | art. 6 ust. 1 lit. b RODO (processing is necessary for the performance of the Account Service Agreement concluded with the data subject or to take steps to conclude it) |
| Providing the above-mentioned personal data is a condition for concluding and performing the agreement for the provision of the Account Service (their provision is voluntary, but the consequence of failure to provide them will be the inability to conclude and perform the above- | | |

mentioned agreement, including the creation of the Account).

The Controller will process the above-mentioned personal data until the statute of limitations for claims under the Account Service Agreement expires.

| Purpose of processing | Personal data processed | Legal basis |
|---|--|---|
| Conclusion and performance of the Application Use Agreement | 1) name and surname 2) E-mail address 3) nu number by phone 4) address of residence/business (street, house number, apartment number, city, postal code, country) 5) optionally - company name and NIP (if the Service Recipient is an Entrepreneur or an Entrepreneur with Consumer rights) | art. 6 ust. 1 lit. b RODO (processing is necessary for the performance of the Application Use Agreement concluded with the data subject or to take steps to conclude it) |

Providing the above-mentioned personal data is a condition for concluding and performing the Application Use Agreement (providing them is voluntary, but the consequence of failure to provide them will be the inability to conclude and perform the Application Use Agreement).

The Controller will process the above-mentioned personal data until the statute of limitations for claims arising from the Application Use Agreement expires.

| Purpose of processing | Personal data processed | Legal basis |
|----------------------------------|--|--|
| Conducting a complaint procedure | 1) name and surname 2) E-mail address | art. 6 ust. 1 lit. c RODO (processing is necessary for compliance with a legal obligation to which the Controller is subject, in this case the following obligations: <ul style="list-style-type: none"> - responding to a complaint – Article 7a of the Consumer Rights Act; - exercising the Customer's rights resulting from the provisions on the Controller's liability in the event of non-compliance of the Physical Goods with the Sales Contract or the Object of Digital Supply with the Contract applicable to it) |

Providing the above-mentioned personal data is a condition for receiving a response to the complaint or exercising the Service Recipient's rights resulting from the provisions on the Controller's liability in the event of non-compliance of the Subject of Digital Service with the Agreement applicable to him (their provision is voluntary, but the consequence of failure to provide

them will be the inability to receive a response to the complaint and the exercise of the above-mentioned rights).

The Controller will process the above-mentioned personal data for the duration of the complaint procedure, and in the case of exercising the above-mentioned rights of the Client – until their limitation expires.

| Purpose of processing | Personal data processed | Legal basis |
|--|-------------------------|---|
| Email notifications | E-mail address | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case informing Service Recipients and Users about the activities undertaken related to the performance of Contracts concluded with Service Recipients and Users) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary in order to receive information about activities related to the performance of the Agreements concluded with the Service Recipients (the consequence of failure to provide them will be the inability to receive the above-mentioned information).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|-------------------------|---|
| Informing about the availability of the Application | E-mail address | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case informing entities about the Application that may be interested in trying it out) |
| <p>The source of e-mail contact data in order to inform entities that may be interested in trying out the Application about the Application is the e-mail address displayed for the entity found by the Controller on the Internet.</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|-------------------------------------|--|--|
| Handling queries submitted by Users | 1) name 2) E-mail address 1) other data contained in the message to the Controller | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of pursuing the legitimate interest of the |

| | | |
|--|--|--|
| | | Controller, in this case responding to the inquiry received) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary in order to receive a response to the inquiry (the consequence of failure to provide them will be the inability to receive an answer).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|---|--|---|
| Share Service Reviews | 1) name 2) optionally – other data included in the Review | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of the legitimate interest of the Controller, in this case making the Opinion available for information and promotional purposes) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary in order to add an Opinion (the consequence of not providing them will be the inability to add an Opinion).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|--|---|
| Fulfilling tax obligations (m.in. issuing a VAT invoice, storing accounting documentation) | 1) Name and surname/company 2) address of residence/registered office 3) TIN | art. 6 ust. 1 lit. c RODO (processing is necessary to comply with a legal obligation to which the Controller is subject, in this case obligations under tax law) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary for the Controller to meet its tax obligations (the consequence of failure to provide them will be the Controller's inability to meet the above-mentioned obligations).</p> <p>The Controller will process the above-mentioned personal data for a period of 5 years from the end of the year in which the deadline for payment of tax for the previous year expired.</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|--|--|
| Compliance with obligations related to the protection of personal data | 1) name and surname 2) contact details provided by you (e-mail address; correspondence address; telephone number) | art. 6 ust. 1 lit. c RODO (processing is necessary to comply with a legal obligation to which the Controller is subject, in this case the obligations |

| | | |
|--|--|---|
| | | resulting from the provisions on the protection of personal data) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary for the proper performance by the Controller of the obligations resulting from the provisions on the protection of personal data, m.in. the exercise of the rights granted to you by the GDPR (the consequence of failure to provide the above-mentioned data will be the inability to properly exercise the above-mentioned rights).</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims for violation of personal data protection regulations.</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|---|--|
| Establishing, exercising or defending against legal claims | 1) Name and surname/company 2) E-mail address 3) address of residence/registered office 4) TIN | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case establishing, investigating or defending against claims that may arise in connection with the performance of the Agreements concluded with the Controller) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary in order to establish, pursue or defend against claims that may arise in connection with the performance of the Agreements concluded with the Controller (the consequence of failure to provide the above-mentioned data will be the inability of the Controller to take the above-mentioned actions)</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of the Agreements concluded with the Controller.</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|---|--|
| Analysis of your activity in the Application | 1) Date and time of the visit 2) IP number of the device 3) device operating system type 4) approximate location 5) type of web browser 6) time spent in the App 7) visited subpages and other actions taken within the Application | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of the legitimate interest of the Controller, in this case obtaining information about your activity in the Application) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary in order for the Controller to obtain information about your activity in the Application (the consequence of failure to provide them will be the Controller's inability to obtain the above-mentioned information).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p> | | |

| Purpose of processing | Personal data processed | Legal basis |
|--|--|---|
| Application administration | 1) IP address 2) server date and time 3) Web browser information 4) Operating System Information The above data are saved automatically in the so-called server logs, each time the Application is used (it would not be possible to administer it without the use of server logs and automatic saving). | art. 6 ust. 1 lit. f RODO (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case ensuring the proper operation of the Application) |
| <p>Providing the above-mentioned personal data is voluntary, but necessary to ensure the proper operation of the Application (the consequence of failure to provide them will be the inability to ensure the proper operation of the Application).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p> | | |

Profiling

In order to create your profile for marketing purposes and direct marketing tailored to your preferences, the Controller will process your personal data in an automated manner, including profiling them – however, this will not have any legal effects on you or significantly affect your situation in a similar way.

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

The legal basis for the processing of personal data for the above purpose is Article 6(1)(f) of the GDPR, according to which the Controller may process personal data in order to pursue its legitimate interest, in this case to conduct marketing activities tailored to the preferences of recipients. Providing the above-mentioned personal data is voluntary, but necessary to achieve the above-mentioned purpose (the consequence of not providing them will be the Controller's inability to conduct marketing activities tailored to the preferences of recipients).

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

Recipients of personal data

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

- a) hosting company;
- b) providers of online payment systems;
- c) newsletter service provider;
- d) companies providing tools for analyzing activity in the Application and directing direct marketing to its users (m.in. Google Analytics);

- e) a company providing accounting services;

In addition, personal data may also be transferred to public or private entities, if such an obligation results from generally applicable law, 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 the services provided by Google LLC, your personal data may be transferred to the following third countries: Great Britain, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

- in the case of the United Kingdom, Canada, Israel and Japan - a decision of the European Commission stating an adequate level of protection of personal data in each of the above-mentioned third countries;
- for the USA, Chile, Brazil, Saudi Arabia, Qatar, India, China, South Korea, Singapore, Taiwan (Republic of China), Indonesia and Australia, adequacy contractual clauses in line 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 under Regulation (EU) 2016/679 of the European Parliament and of the Council.

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

Permissions

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 this data (the so-called right of access). Issuing the first copy of the data is free of charge, for subsequent copies the Controller may charge a fee;
- 2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
- 3) in certain situations, you can ask the Controller to delete your personal data, e.g. when:
 - a) the data will no longer be needed by the Controller for the purposes of which it has informed;
 - b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
 - c) the processing is unlawful;
 - d) the need to delete the data results from a legal obligation to which the Controller is subject;
- 4) if personal data is processed by the Controller on the basis of the consent granted to the processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another Controller;
- 5) if personal data is processed by the Controller on the basis of your consent to the processing, you have the right to withdraw this consent at any time (the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal);
- 6) if you believe that the processed personal data are incorrect, their processing is unlawful, or the Controller no longer needs certain data, you can request that for a specified period of time (e.g. checking the correctness of the data or pursuing claims) the Controller does not perform any operations on the data, but only stores them;

- 7) you have the right to object to the processing of personal data based on the legitimate interest of the Controller. In the event of an effective objection, the Controller will cease to process personal data for the above-mentioned purpose;
- 8) you have the right to lodge a complaint with the President of the Office for Personal Data Protection if you believe that the processing of personal data violates the provisions of the GDPR.

Cookies

1. The Controller informs that the Application uses "cookies" installed on your end device. These are small text files that can be read by the Controller's system, as well as by systems belonging to other entities whose services are used by the Controller (e.g. Facebook, Google).
2. The Controller uses cookies for the following purposes:
 - a) ensuring the proper operation of the Application – thanks to cookies, it is possible for the Application to operate efficiently, use its functions and conveniently move between individual subpages;
 - b) increasing the comfort of using the Application – thanks to cookies, it is possible to detect errors on some subpages and constantly improve them;
 - c) creating statistics – cookies are used to analyse the manner in which the Users of the Application use the Application. This makes it possible to constantly improve the Application and adapt its operation to the preferences of users;
 - d) conducting marketing activities – thanks to cookies, the Controller can direct advertisements to users tailored to their preferences.
3. Your Controller can place both permanent and temporary (session) files on your device. Session cookies are usually deleted when you close your browser, but closing your browser does not delete persistent cookies.
4. Information about cookies used by the Controller is displayed in the panel located at the bottom of the website/footer of the Application. Depending on your decision, you can enable or disable cookies of particular categories (except for necessary cookies) and change these settings at any time.
5. The data collected by means of cookies do not allow the Controller to identify you.
6. The Controller uses the following cookies or tools using them:

| TOOL | SUPPLIER | FUNCTIONS AND SCOPE OF DOWNLOADED DATA | DURATION |
|----------------------------|------------|--|---|
| Strictly necessary cookies | Controller | The operation of these files is necessary for the proper functioning of the Application/Application website, therefore you cannot disable them. Thanks to these files (collecting, m.in, the IP number of your device), it is possible, m.in, to inform you about cookies running in the Application | Most of the necessary cookies are session cookies, but some remain on your end device for a period of 3 months or until they are deleted; |
| Google Analytics | Google | This tool enables the collection of statistical data on the manner in which Users use the Application, m.in. the number of visits, the duration of visits, the search engine used, and location. The data | up to 2 years or until they are removed (whichever occurs first) |

| | | | |
|----------------|----------|---|--|
| | | collected helps to improve the App and make it more user-friendly | |
| Facebook Pixel | Facebook | This tool also allows us to determine that you have opened the App and to target you with advertisements displayed on Facebook and Instagram social networks and measure their effectiveness. | up to 3 months or until they are removed (whichever comes first) |

7. Through most commonly used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation in the future by the Application. However, disabling or limiting the use of cookies may cause quite serious difficulties in using the Application, e.g. in the form of the need to log in on each subpage, longer loading period of the Application, limitations in the use of certain functionalities.

Final provisions

To the extent not regulated by the Policy, the generally applicable provisions on the protection of personal data shall apply.

The policy is effective from 11 June 2024.

DMCA AND TAKEDOWNS POLICY

AI Sprinter respects the intellectual property rights of others. If you believe that material located on or linked to by the Services violates your copyright or trademark, please send a notice of claimed infringement to aisprinter.office@gmail.com with the subject "Takedown Request".

The takedown notice should include:

- 1) Your personal and contact data: name, e-mail address, postal address, telephone number,
- 2) Identification of the copyrighted work (or trademark) you believe to have been infringed or, if the claim involves multiple works, a representative list of such works,
- 3) Identification of the material you believe to be infringing in a sufficiently precise and detailed manner to allow us to locate that material,
- 4) A statement that you have a good faith belief that use of the copyrighted material is not authorized by the copyright owner, its agent, or the law,
- 5) A statement that the information in the written notice is accurate,
- 6) **A statement, under penalty of perjury, that you are authorized to act on behalf of the copyright owner,**
- 7) If the copyright owner's rights arise under the laws of a country other than the United States, please identify the country.
- 8) Your signature (electronic or physical).

The DMCA requires that you swear to the facts in your copyright complaint under penalty of perjury. It is a federal crime to intentionally lie in a sworn declaration.

Be aware that if you knowingly misrepresent that material or activity on the Services is infringing your copyright, you may be held liable for damages (including costs and attorneys' fees) under Section 512(f) of the DMCA.

You may also send takedown notices to the following address:

Grupa RB Altum sp. z o.o.

ul. Mała Góra 88 lok. 25,

30-864 Kraków

Upon receipt of a takedown notice that complies with the foregoing, we reserve the right to:

- 1) remove or disable access to the accused material or disable any links to the material,

- 2) notify the party accused of infringement that we have removed or disabled access to the identified material,
- 3) terminate access to and use of the Services for any user who engages in repeated acts of infringement.

If you believe that your material was removed or access to it was disabled by mistake or misidentification, you may file a counter-notification with us by submitting a written notification to our copyright agent designated above. Such notification must include substantially the following:

- 1) Your personal and contact data: name, e-mail address, postal address, telephone number,
- 2) An identification of the material that has been removed or to which access has been disabled and the location at which the material appeared before it was removed or access disabled,
- 3) A statement under penalty of perjury by you that you have a good faith belief that the material identified above was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled,
- 4) A statement that you will consent to the jurisdiction of the Federal District Court for the judicial district in which your address is located (or if you reside outside the United States for any judicial district in which the Services may be found) and that you will accept service from the person (or an agent of that person) who provided us with the complaint at issue.

Be aware that if you knowingly materially misrepresent that material or activity on the Services was removed or disabled by mistake or misidentification, you may be held liable for damages (including costs and attorney's and fees) under Section 512(f) of the DMCA.

The DMCA allows us to restore the removed content within 10-14 business days unless the complaining party initiates a court action against you during that time and notifies us of the same.