



HOLO vectors Sp. z o. o.
seated in Poznań

Privacy Policy

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1. WHAT ARE PERSONAL DATA AND THEIR PROCESSING?

- 1.1. Personal data, as defined by the GDPR, encompasses any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, contact details, identification number, location data, or an online identifier.
- 1.2. Processing of personal data, according to the GDPR, includes any operation performed on personal data, such as collection, recording, storage, adaptation, alteration, sharing, and deletion of data.
- 1.3. Users of our website **are generally anonymous**. However, if a user chooses to fill out a contact form or subscribe to our newsletter, we may be able to identify them. If not, they remain anonymous and may not access the rights outlined in point 13 of this policy unless they provide information enabling their identification.

2. PERSONAL DATA ADMINISTRATOR

- 2.1. The administrator of your personal data and the owner of the website www.holovectors.com (hereinafter referred to as the "**Website**") is **HOLO vectors Limited Liability Company based in Poznań (60-113) at 3 Reglowa Street**, registered in the National Court Register kept by the District Court Poznań Nowe Miasto i Wilda in Poznań, VIII Economic Division of the National Court Register, under the number: 0000646704 (hereinafter referred to as the "**Administrator**" or "**we**").
- 2.2. The Administrator has appointed a Data Protection Inspector in the person of Mateusz Krukowski, who can be contacted by e-mail at iod@holovectors.com.
- 2.3. Additionally, you can contact the Administrator in writing via traditional mail at the following address: HOLO vectors Ltd., Reglowa 3 Street, Poznań (60-113), or at the following address: Fałkowo 1P, 62-262 Fałkowo.

3. SOCIAL MEDIA

- 3.1. The Administrator maintains a profile on the LinkedIn social media platform, as a result of which we process the personal data of individuals who visit our profile on these social media platforms.
- 3.2. Additionally, the Website may feature plugins for the social media platforms, as well as other social tools utilizing tracking technologies. When visiting our Website, your web browser may record visit information and may transmit it to the administrator of the respective social media service. Information collected by plugins may be used by social media administrators for their own purposes, over which we have no control, and in a manner determined by them, over which we also have no control (we have no control over, for example, managing shared information or tracking by social media services). Each of the social media administrators operates its entire

service infrastructure and has its own data processing policies described in its privacy policy. You can learn more about the details of personal data processing on the websites of the administrators of these social media platforms:

3.2.1. LinkedIn: <https://www.linkedin.com/legal/privacy-policy?>

- 3.3. Social media plug-ins may collect and transmit information to social media administrators even when you visit our Website without logging in to your account on a given social networking site. If you are logged in to your account on a social networking site, the respective administrator of that social networking site may associate your visit to our Site with your profile on the given social networking site. If you want to avoid this, you must log out of your account on a given social networking site before visiting the Website.
- 3.4. On our social media profiles, there may be instances of partial co-administration within the meaning of Article 26 section 1 GDPR of your personal data between us and the administrators of social media platforms. Detailed rules regarding responsibility for personal data processing are outlined in the respective privacy policies of the social media platforms. In matters where social media administrators afford the Administrator the opportunity, it takes all steps to ensure that the processing is in accordance with data protection regulations.

4. RULES FOR THE PROCESSING OF PERSONAL DATA BY US

- 4.1. The Administrator protects the privacy of people using the Website (hereinafter referred to as **"Users"** or **"User"**), as well as the Administrator's fan page on social media.
- 4.2. Derived from the general principles of internet connections, the information contained in system logs (e.g., IP address) is utilized by the Administrator for technical purposes related to server administration. Additionally, IP addresses are used to gather general, statistical demographic information (e.g., about the region from which the connection is made). Subscribing to services offered by the Administrator, such as newsletters, or using a contact form requires providing information enabling communication with the User (e.g., name, surname, phone number, email address). The information provided in the form is used by us for necessary communication with our Users and for better tailoring the content and advertisements presented by us to their needs and interests.
- 4.3. We collect personal data only to the extent necessary to achieve the purposes for which they are collected. We do not collect unnecessary data.
- 4.4. We limit the storage of personal data only to the period necessary to achieve the purposes for which they are collected, unless there are events that may extend the data storage period (such as a change in regulations requiring the extension of the data storage period or a legal dispute with the person whose data we process).
- 4.5. If personal data are entrusted to be processed by other entities, this is done securely, protected by an appropriate data processing agreement, in accordance with applicable legal regulations.

5. PURPOSES AND BASIS OF PERSONAL DATA PROCESSING

- 5.1. Below, we specify the purposes for which we process users' personal data when they use the Website and our social media channels.:
- 5.2.

5.3. Purpose of data processing	5.4. Legal basis	5.5. Planned date of deletion of personal data
5.6. for the purpose of conducting analytical and statistical measurements regarding the use of our Service (in the case of using optional cookie files)	5.7. Article 6 section 1 letter f) GDPR - implementation of the Administrator's legitimate interest, which is determining which content on the Website is more and less popular	5.8. until the consent to saving them on the Website is withdrawn 5.9. or until the submission of justified objection regarding the processing of data - whichever comes first
5.10. for the purpose of sending newsletters.	5.11. Article 6 section 1 letter b – performance of the contract for sending the newsletter	<ul style="list-style-type: none"> • until the User receives a request to terminate the newsletter subscription • personal data will also be deleted if we decide to terminate the newsletter
5.12. for the purpose of responding to the question sent by you in the contact form.	5.13. Article 6 section 1 letter f) GDPR - implementation of the Administrator's legitimate interest in ensuring legality	5.14. for 3 months from the date of receiving your message, unless we can process this data on a different legal basis and for another purpose, e.g. if, as a result of contact with us, we conclude a contract
5.15. if you visit our fan page on the LinkedIn social media platform or use its plugin on the Website - for the effective management of our fan page on the aforementioned platform and enabling you to interact with us through it, as well as for promoting our website on social media.	5.16. Article 6 section 1 letter f) GDPR - implementation of the legitimate interest of the Administrator	5.17. until a justified objection is raised

6. COOKIES AND SIMILAR TECHNOLOGIES

Cookies

6.1. In relation to operating the Website, we use so-called cookies. They can be read by our system as well as by systems belonging to our trusted partners, whose list is provided in point 6.5 below.

- 6.2. We use necessary cookies and optional cookies - analytical, statistical, functional and marketing.
- 6.3. Obtaining the User's consent to the use of essential cookies is not necessary to use them, but the User may consent to the use of all or selected optional cookies. Consent may be withdrawn or changed at any time by clicking the button on the Website.
- 6.4. According to applicable law, consent to install optional cookies can be given by appropriately configuring the User's browser.
- 6.5. Our trusted partners include:
 - 6.5.1. LinkedIn,
 - 6.5.2. Google,
 - 6.5.3. Matomo,
 - 6.5.4. CookieYes.
- 6.6. The website may contain links to external websites or trusted partner websites indicated in point 6.5. above. By accessing an external website or a third-party website, Users are subject to a separate privacy policy and personal data protection policy for that website. The User should review the privacy policy and personal data protection policy of each external website and third-party website.
- 6.7. Two types of cookies are used:
 - 6.7.1. session cookies, which are deleted from the hard drive of the user's device after the end of the browser session or when the computer or mobile device is turned off.
 - 6.7.2. persistent cookies, which are stored in the memory of the computer or mobile device until they are manually deleted by the user through appropriate browser tools or until they expire.
- 6.8. The Administrator collects and processes the following User Information collected using cookies:
 - 6.8.1. IP address,
 - 6.8.2. unique User ID,
 - 6.8.3. timestamp of submitted queries,
 - 6.8.4. title of the visited page.,
 - 6.8.5. URL of the visited page,
 - 6.8.6. URL of the previously visited page,
 - 6.8.7. screen resolution,
 - 6.8.8. local time,
 - 6.8.9. clicked and downloaded files,
 - 6.8.10. clicked links to external sites,
 - 6.8.11. page generation time,
 - 6.8.12. User's location (country, region, city, approximate longitude and latitude),
 - 6.8.13. browser language,
 - 6.8.14. User Agent of the browser used,
 - 6.8.15. the time of first use of the Website by the selected User,
 - 6.8.16. time of previous use of the Website by the selected User,
 - 6.8.17. the number of visits to the Website by the selected User.
- 6.9. In connection with providing services through the Website, we use cookies for the purpose of:
 - 6.9.1. rendering services;

- 6.9.2. ensuring security, i.e. user authentication;
 - 6.9.3. customizing the presented content of the website to the user's preferences and optimizing the use of web pages;
 - 6.9.4. creating statistics that help understand how users interact with the website, enabling improvement of its structure and content;
 - 6.9.5. presenting personalized advertisements, taking into account user interests or their place of residence;
 - 6.9.6. influencing the processes and performance of using the website;
 - 6.9.7. using social features.
- 6.10. Storing cookies or accessing them by the Administrator does not cause configuration changes in the end-user's telecommunication device and the software installed on that device. The entity placing information in the form of cookies (so-called "cookies") and other similar technologies on the end-user's terminal device (e.g., computer, laptop, smartphone), and accessing them, are the Administrator and trusted partners indicated in point 6.5.
- 6.11. The website may place a cookie file in the browser if the browser allows it. Importantly, the browser permits the website to access only the cookies placed by that website, and not those placed by other websites.
- 6.12. Your web browser by default allows the use of cookies on your end device, so we kindly ask for your consent to use cookies during your first visit. If you give your consent to enable cookie support in the software you use, this will be equivalent to consenting to the use of cookies by the website, as defined in Article 173 section 2 of the Telecommunications Law Act of 16 July 2004. In this case, the Administrator will be authorized to use cookies and similar technologies to store information or gain access to information stored on the end telecommunication device of the User. This consent allows the Administrator, as well as cooperating advertisers, research companies, or multimedia application providers, to use cookies. However, if you do not wish to use cookies while browsing the website, you can change the settings in your web browser to completely block automatic cookie handling or request notification each time a cookie is placed on your device. Settings can be changed at any time.
- 6.13. Disabling or limiting cookie support may cause difficulties in using the website, such as the need to log in on each subpage, longer loading times, limitations in using functionalities, restrictions on liking the page on LinkedIn, etc.

Server logs

- 6.14. Using the website involves sending requests to the server where the website is stored.
- 6.15. Each request sent to the server is recorded in server logs. The logs include your IP address, the date and time the request was sent to the server, as well as information about the internet browser and operating system you are using.
- 6.16. The logs are recorded and stored on the server.
- 6.17. The data stored in the server logs is not associated with you and is not used by us for identification purposes.
- 6.18. Server logs serve solely as auxiliary material for administering our website, and their content is not disclosed to anyone other than individuals authorized to administer the server.

Other technologies

6.19. We use the following technologies to track your activities on the Website:

- 6.19.1. Google Analytics tracking code – to analyze website statistics. We use Google Analytics 4;
- 6.19.2. heat maps that show navigation on our website, i.e. website statistics;
- 6.19.3. collecting information such as the number of clicks on the link, location and source of the click.

7. RIGHT TO WITHDRAW CONSENT

7.1. If personal data processing is based on consent, you may withdraw it at any time.

7.2. To withdraw consent, please:

7.2.1. send an email directly to the Administrator at contact@holovectors.com or

7.2.2. block the processing of cookie files by clicking on the link provided on the Website or by changing the settings of your internet browser.

7.3. If personal data processing was based on consent, we have the right to process personal data until the consent is withdrawn. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

7.4. Withdrawing consent will not result in any negative consequences; however, it may lead to the inability to use some of our services.

8. REQUIREMENT TO PROVIDE PERSONAL DATA

8.1. Providing any personal data is voluntary and depends on your decision. As we noted at the beginning, unless you take steps to reveal your personal details (name, surname, e-mail address), we will almost certainly not be able to identify you. However, in some cases - i.e. when signing up for the newsletter - providing certain personal data is necessary to meet your expectations regarding the use of the service of receiving it.

8.2. In order to contact you by phone in matters related to the provision of the service, it is necessary to provide a telephone number - without it we are unable to establish telephone contact.

8.3. In order to receive discounts on future services, it is necessary to provide your first name, last name, and email address — without this, we are unable to send discount codes.

9. AUTOMATED DECISION-MAKING OR PROFILING

Your personal data is not profiled by us, nor are they subject to any form of automated processing resulting in decisions that have legal effects on you or similarly significantly affect you.

10. RECIPIENTS OF PERSONAL DATA

10.1. Your personal data may be disclosed to various entities by us - depending on the relationship between us and the purposes for which we process personal data. Our recipients include::

10.1.1. hosting service providers, including cloud services - Beyond.pl, Horyzont Technologies Internetowe Sp. z o.o.

10.1.2. email service providers,

- 10.1.3. providers of newsletter and other marketing materials distribution services,
- 10.1.4. accounting or legal services providers.
- 10.2. Personal data will be transferred outside the European Economic Area only when necessary and only based on legal grounds specified by the GDPR regulations. Therefore, your personal data may be transferred to third countries (e.g., the USA) due to:
 - 10.2.1. CookieYes – cookie analytics tool based in the United Kingdom (when transferring to the UK, the adequacy decision applies, meaning that no additional safeguards are necessary);
 - 10.2.2. in the case of conducting email correspondence and analyzing website statistics, the data recipient may be Google LLC, based in the USA, along with its subsidiaries and subcontractors also based in the USA, as our partner is Google Ireland Ltd affiliated with the aforementioned entities.
- 10.3. The legal basis for transferring personal data outside the European Economic Area, including to the aforementioned data recipients, as well as the legal mechanism securing this transfer, are the Standard Contractual Clauses adopted by the European Commission, and in the case of transfers to the United Kingdom, the adequacy decision. Additionally, companies acting as data recipients based in the USA may be part of the Data Privacy Framework. The list of entities included in this framework can be viewed on this website:
<https://www.dataprivacyframework.gov/list>.
- 10.4. At any time, we will provide you with additional explanations regarding the transfer of personal data, especially if this issue raises any concerns for you.
- 10.5. At any time, you have the right to obtain a copy of the personal data transferred to a third country.

11. PERSONAL DATA PROCESSING PERIOD

- 11.1. In accordance with applicable law, we process personal data only for the time necessary to achieve the designated purpose. After this period, your personal data will be irreversibly deleted or destroyed.
- 11.2. We process personal data for the period specified in point 5.
- 11.3. Remember that if the processing of personal data for one purpose becomes outdated, we may continue to process your data if we have another legal basis and purpose for doing so.

12. RIGHTS OF THE DATA SUBJECT

- 12.1. In connection with the processing of data by the Administrator, you have the right to:
 - 12.1.1. request from the Administrator access to personal data;
 - 12.1.2. request the Administrator to correct personal data,
 - 12.1.3. request the Administrator to delete personal data,
 - 12.1.4. request from the Administrator to limit the processing of personal data in the situation and on the terms specified in Article 18 GDPR or to delete them in accordance with Article 17 GDPR,
 - 12.1.5. object to the processing of your personal data in accordance with Article 21 section 1 GDPR,
 - 12.1.6. transfer of your personal data in accordance with Article 20 GDPR,
 - 12.1.7. submit a complaint to the supervisory authority (President of the Personal Data Protection Office).

- 12.2. Mentioned in point 12.1. the rights are not absolute, so in some situations we may lawfully refuse to fulfill them. Refusal to accept the request will be preceded by a thorough analysis and will be issued only if necessary.
- 12.3. You can exercise your rights by:
- 12.3.1. sending an e-mail directly to the Administrator at iod@holovectors.com;
 - 12.3.2. sending the request by traditional post to the Administrator's address.
- 12.4. Requests will be processed without undue delay, but no later than one month after receipt. This period may be extended due to the complexity of the request or the number of requests, by an additional two months, of which you will be notified via email.

13. NEWSLETTER

- 13.1. The website may allow you to subscribe to a free newsletter and receive it electronically.
- 13.2. Subscribing to the newsletter requires providing your email address and first name. The email address will be used solely for sending you the newsletter.
- 13.3. After subscribing to the newsletter, you will receive regular updates, focusing particularly on the medical industry and new technologies in medicine. The information provided in the newsletter may constitute commercial information within the meaning of Article 2 of the Act of 18 July 2002, on the provision of electronic services concerning our business activities.
- 13.4. The newsletter may be sent by us throughout the week.
- 13.5. You can unsubscribe from our newsletter at any time by clicking the appropriate link located at the bottom of each message.
- 13.6. All complaints and grievances related to the provision of newsletter services can be reported by the User at any stage of the service provision.
- 13.7. The complaint should be addressed in writing to the Administrator's address or via email to contact@holovectors.com, with the note „Newsletter Complaint”.
- 13.8. To be effective, the complaint should include the User's email address, a description of the circumstances constituting the basis for the complaint and the request.
- 13.9. We will consider the complaint within 30 days from the date of its receipt. The User will be notified about the result of the complaint in the form of e-mail correspondence sent to the e-mail address provided by the User or the e-mail address from which the User contacted us.
- 13.10. The administrator may discontinue the provision of the newsletter service at any time.
- 13.11. Any other questions and comments regarding the newsletter should be sent to contact@holovectors.com. We will respond within 14 business days.

14. FINAL PROVISIONS

- 14.1. The privacy policy may change at any time chosen by us, so it's worth visiting the Website periodically. If you subscribe to the newsletter service, we will inform you of any changes to the privacy policy via email to the address provided during newsletter registration.
- 14.2. This Privacy Policy is effective as of **8 March 2024**.

