

TECH365 PRIVACY POLICY

We respect your privacy and pay particular attention to the protection of personal data. For this reason, all correspondence directed to us (also electronically by e-mail) is protected in accordance with this Privacy Policy. We want every person who visits our website or contacts us in any other way to know how we protect their privacy and how they can protect it themselves. We therefore encourage you to read this Privacy Policy carefully.

This document also constitutes the fulfilment of the obligation referred to in Article 14(1) GDPR.

Definitions used in this Policy

- 1. A User** within the meaning of this Privacy Policy is any natural person visiting the website or using the services offered through it (e.g., NEWSLETTER, events organised by TECH365), as well as any contractor, business partner, project participant or employee of an entity cooperating with TECH365.
- 2. GDPR** means 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.
- 3. Personal data** within the meaning of this Privacy Policy means any information about an identified or identifiable natural person, including the device's IP address, location data, online identifier and information collected via cookies and similar technologies.

Who is responsible for processing your personal data?

- 4.** The Controller of your personal data is **TECH365 Spółka z ograniczoną odpowiedzialnością** with its registered office in Warsaw (KRS: 0001234989, NIP: 5273214145, REGON: 544494765), registered office: ul. Wolska 50, 01-187 Warsaw, Poland.
- 5.** The Controller operates an internet portal (the Service). Please note that by visiting the website, sending an application to participate in projects, an enquiry, a membership/cooperation declaration, or by sending us correspondence (including electronic correspondence), you accept the rules of this Privacy Policy.
- 6.** We also use social media (e.g., Facebook, LinkedIn, Instagram), where information about us can be found and where you can communicate with us. However, the rules concerning the protection of personal data on those platforms are regulated separately by their owners.
- 7.** Providing personal data is voluntary; however, providing certain personal data or a username and password is necessary to use individual services of the Service and/or projects offered through it. If a User refuses to provide data or to grant consent, we will not be able to provide such services to them.
- 8.** Persons who participate in the implementation of projects/services available in the Service are asked to provide the data necessary for identification and account handling (login and password) granted earlier in accordance with the regulations of those

projects/services.

9. The Controller selects and applies, with due diligence, appropriate technical and organisational measures to ensure the protection of the personal data being processed. Full access to databases is held only by persons duly authorised by the Controller and granted appropriate permissions.

10. The Personal Data Protection System operating at the Controller, as well as the individual solutions applied, are regularly reviewed and updated when necessary (such actions are also performed on an ongoing basis — primarily as regards technical safeguards).

11. Therefore, your personal data is protected against being made available to unauthorised persons, as well as against being processed in breach of applicable laws.

12. The personal data we process is not subject to automated decision-making, including profiling.

13. Visitors may browse the website without prior registration and without providing personal data.

For what purpose do we process personal data?

14. Personal data (primarily: first names and surnames; contact details — e-mail, telephone number, data related to other forms of electronic communication; correspondence data — address, city, street, postal code; data of the entity for which you work, including its address and contact details) is processed on the following bases:

- 1) Article 6(1)(a) GDPR (on the basis of the User's consent) — for the purpose of surveying satisfaction levels or ensuring the participation of users in our projects, activities and events;
- 2) Article 6(1)(b) GDPR — for the purpose of performing and on the basis of an agreement concluded with our Counterparties, and for the improvement of the functionalities and services provided through the website; for this purpose we analyse User activity and preferences, and engage in marketing of our own products and services;
- 3) Article 6(1)(c) GDPR — for the purpose of fulfilling a legal obligation imposed on the Controller (this primarily concerns data of TECH365 employees and contractors);
- 4) Article 6(1)(f) GDPR (on the basis of the Controller's legitimate interest) — for the purpose of pursuing or securing claims, conducting direct marketing, and recording and disseminating information about events, initiatives and projects organised by TECH365.

15. User activity within the Service, including personal data, may also be recorded in system logs — these are collected in connection with the provision of services, including those resulting from concluded agreements. We process such data also for technical purposes — for example, data may be temporarily stored and processed to ensure the security and proper functioning of IT systems, e.g., in connection with making backup copies, testing changes in IT systems, detecting irregularities, or protecting against abuse and attacks.

How long do we process personal data?

16. As a rule, data is processed for the duration of the provision of the service or the performance of the order, until consent is withdrawn or an effective objection is raised against processing in cases where the legal basis for processing is the Controller's legitimate interest.

17. Furthermore, in the case of employment, data is processed (including stored) in accordance with applicable law (including for the period of employment and for the period necessary to complete the recruitment process). Where the User has given consent for the processing of personal data for future recruitment purposes, such data will be processed for no longer than one calendar year from the date of application.

18. The processing period may be extended where processing is necessary for the establishment, exercise or defence of legal claims, and afterwards only to the extent and in cases required by law. After the processing period has elapsed, the data is irreversibly deleted or anonymised.

Recipients of the data

19. In connection with the implementation of projects/services, personal data may be transferred to external entities, in particular to suppliers and producers responsible for the operation, update and supply of IT systems, the implementation of individual stages of events organised by TECH365, and other entities such as accounting, legal, audit, consulting, and courier service providers.

20. Subject to the User's consent, their data may also be made available to other entities for their own purposes, including marketing purposes. In addition, we may occasionally transfer the User's data to another Controller in order to pursue that Controller's legitimate interest, however we will inform the User in advance, and the information obligation referred to in Article 14 GDPR will rest on the new Controller — the User may exercise their rights in relation to that Controller.

21. Personal data is, as a rule, not transferred to third countries / international organisations outside the European Economic Area (EEA), and decisions concerning the data are not made in an automated manner. If, in connection with the cooperation with foreign business partners, data has to be transferred outside the EEA, this will take place only on the basis of an adequacy decision of the European Commission pursuant to Article 45(1) GDPR or on the basis of appropriate safeguards (Article 46 GDPR).

22. We do not cooperate with entities that do not provide a guarantee of proper personal data protection, in particular with entities outside the EEA that do not comply with the requirements of the GDPR and this Privacy Policy.

Cookies Policy

23. The website uses cookies. These are small text files sent by a web server and stored by the user's browser software. When the browser reconnects to the website, the site recognises the type of device from which the user is connecting. The parameters allow the information contained in them to be read only by the server that created them. Cookies therefore make it easier to use previously visited websites.

24. The information collected concerns the IP address, type of browser used, language, type of operating system, internet service provider, time and date information, location, and information transferred to the website via the contact form.

25. The collected data is used to monitor and verify how users use our websites in order to improve the functioning of the page by ensuring more efficient and trouble-free navigation. We monitor information about users using the Google Analytics tool, which records user behaviour on the page. For statistical, advertising or additional functional purposes, we also use other tools, e.g., Google Ads, Meta Pixel.

26. Cookies identify the User, which makes it possible to adjust the content of the website used to their needs. By remembering their preferences, cookies enable advertising directed to them to be properly tailored. We use cookies to guarantee the highest standard of comfort of our service.

27. On our website we use the following cookies:

- 1) **“performance”** cookies, enabling the collection of information on how the website is used;
- 2) **“functional”** cookies, enabling the “memorisation” of the user-selected settings and the personalisation of the user interface, e.g., regarding the language or region of origin, font size, layout of the website, etc.;
- 3) **“advertising”** cookies, enabling the delivery of advertising content tailored more closely to users' interests.

28. The User may at any time disable or restore the option of collecting cookies by changing the settings in their internet browser.

User rights

29. The User has the right to access the content of their data, obtain a copy of it, rectify it, erase it, restrict its processing, port the data, object to the processing of data on the basis of the Controller's legitimate interest or against processing for the purpose of direct marketing, and to withdraw consent at any time without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

30. If it is considered that the processing of personal data infringes the provisions of the GDPR or other personal data protection regulations, the data subject may lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).

31. A request regarding the exercise of data subjects' rights may be submitted in writing or by e-mail to the Controller's contact details indicated below, as well as in the manner specified in the regulations of individual projects and/or services.

32. The request should, as far as possible, indicate precisely what it concerns. In particular, what right the person submitting the request wishes to exercise and which processing activity the request concerns.

33. If the Controller is unable to determine the content of the request or to identify the person submitting the request based on the submission, the Controller will ask the requester for additional information.

Contact details of the Controller

34. If you have any doubts as to the scope and purpose of the processing of your personal data, and as to the rights to which you are entitled in this connection, please read this Privacy Policy or contact us by e-mail at: **info@beltech.global** or in writing to the address of our registered office indicated above.

We know that we are responsible for the protection of the data entrusted to us by Users. We take security matters seriously. We therefore take care to protect your data against unauthorised access by third parties, and we review our methods of collecting, storing and processing information. We apply appropriate technical, physical and organisational security measures. We grant access to data only to those employees and entities that need to have access to it in order to process it solely for the purposes described in the Privacy Policy.

Last updated: 4 May 2026