

PRIVACY POLICY

VENTURE INC SPÓŁKA AKCYJNA for the website www.ventureinc.com

§ 1. General Provisions

1. The Controller ensures that he makes every effort to process Personal Data with the greatest respect for the privacy of data subjects and with the utmost care for the security of Personal Data being processed, and in particular ensures that he has taken appropriate legal measures to ensure the security of Personal Data.
2. The Controller states that he implements technical and organizational measures to protect the Personal Data processed with protection appropriate to the risks and the category of data being protected; in particular, it must protect data against their unauthorized disclosure, takeover by an unauthorized person, processing in breach of the act, and change, loss, damage or destruction.
3. By accepting this Privacy Policy, the User agrees to the processing of their Personal Data in connection with the use of the Website described herein.

§ 2. Definitions

Whenever the Privacy Policy refers to:

- 1) **Controller** – shall mean VENTURE INC SPÓŁKA AKCYJNA with its registered office in Wrocław, al. gen. J. Hallera 180/14, 53-203 Wrocław, registered in the Register of Entrepreneurs kept by the District Court for Wrocław-Fabryczna in Wrocław, 6th Commercial Division of the National Court Register under KRS number: 0000299743, NIP No.: 8992650810, REGON: 020682053. The Controller shall also be understood as the Personal Data controller within the meaning of Article 4 item 7 GDPR;
- 2) **Personal Data** – means information about an identified or identifiable person (in the case of Privacy Policy – the User); an identifiable person is someone who can be directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location details, Internet identifier or one or more specific factors determining physical, physiological, genetic, psychological, economic, cultural or social identity of a person;
- 3) **Software** – means web browsers that the User may use to access the website www.ventureinc.com;
- 4) **Cookie files** (so-called “cookies”) – means computer data, in particular text files that are stored in the User’s device and are intended for the use of the websites;
- 5) **Project** – means a set of investment tasks that are mutually dependent and collectively strive to achieve the purpose of the investment project. The project should take into account such factors as: revenue-focused attitude, market competitiveness, market niche, innovation, possibility of achieving success on more developed markets;

- 6) **Personal Data processing** – means the operation or set of operations performed on personal data or personal data sets in an automated or non-automated manner, such as collecting, recording, organizing, ordering, storing, adapting or modifying, downloading, browsing, using, disclosing by sending, distributing or otherwise sharing, matching or linking, limiting, deleting or destroying;
- 7) **Website or Web page** – means a website operating at: www.ventureinc.com;
- 8) **Agreement** – means any legal relationship between the User and the Controller, the conclusion of which takes place through the use of the Website, in particular concerning the User submitting a Project via a form located on the Website, and from the Controller: examining said Project, primarily in terms of its successful implementation with potential investors, and ultimately (in the event that the Controller recognizes that the Project has a chance of success) – the implementation of the Project by the Controller;
- 9) **Device** – means an electronic Device through which the User gains access to the Website, in particular: PCs, laptops, tablets, smartphones.
- 10) **User** – means a person who submits the Project via the Website;
- 11) **Project Submission** – means the completion of the electronic form provided on the Website, taking into account the Project's characteristics.

§ 3. Personal Data Processing

1. Users' Personal Data will be processed in order to perform the Agreement, make financial settlements and for marketing purposes. The legal basis for the processing of Personal Data shall be, respectively:
 - 1) necessity to perform an Agreement;
 - 2) necessity to fulfill the Controller's legal obligation – Article 106e par. 1 of the Act of March 11, 2004 on Value Added Tax;
 - 3) legitimate interest – in relation to the processing of Personal Data for marketing purposes during the legal relationship between the User and the Controller, as well as the processing of Personal Data after completing the Agreement for the period in which the User may direct to the Controller any claims related to the performance of the Agreement;
 - 4) the User's consent – in the case of data processing for marketing purposes after the end of the legal relationship between the User and the Controller.
- 2. Providing Personal Data by the User is voluntary, but necessary to submit a Project.**
3. The User may also express a separate consent to receive commercial, advertising and marketing information from the Controller. The User may resign from receiving them at any time.
4. The Controller processes or may process the following of the User's Personal Data, which the User provides voluntarily upon Project Submission:
 - 1) name,
 - 2) e-mail addresses,
 - 3) phone number.

5. In further cooperation between the User and the Controller, in particular when a Project is selected by the Controller, in addition to the Personal Data referred to in par. 4, the Controller shall process additional User's Personal Data:
 - 1) surname,
 - 2) PESEL No.,
 - 3) address for correspondence,
 - 4) ID card number.
6. The Controller stores Personal Data in the Users database in order to facilitate any future contacts with Users in order to implement Projects.
7. The recipients of Personal Data are persons authorized by the Controller to process data in the course of performing their duties, operators whom the Controller orders to perform activities related to the Projects and IT, accounting, HR, legal and tax administration, in particular on the basis of agreements for entrusting the processing of personal data.
8. The Controller declares that he may use tools designed to analyze traffic on the Website, such as Google Analytics and other similar tools.
9. The Controller has the right to share the User's data and information in the course of proceedings with an authorized authority, such as the prosecutor's office or the court.
10. After completing the Agreement, the Controller shall process the User's Personal Data for the period in which the User may direct to the Controller any claims regarding the performance of the Agreement. The Controller will also process the User's Personal Data, whose Project the Controller has refused to implement, for a period during which the User may file claims against the Controller.
11. The Controller shall adhere to the following principles of processing Personal Data:
 - 1) saves the collected Personal Data only on such information carriers that are protected against access by third parties;
 - 2) supervises the security of Personal Data throughout their entire period in a manner that particularly ensures protection against unauthorized access, damage, destruction or loss;
 - 3) maintains the confidentiality of Personal Data.
12. The User whose Personal Data is processed has the right to demand the Controller to provide access to data as well as rectification, deletion, restriction of processing or to object to the processing, in accordance with § 5 hereof.

§ 4. Cookies

1. The Controller uses cookie files through the Website.
2. The Website uses two basic types of cookies:
 - 1) session cookies – these are temporary files that are stored in the User's device until leaving the website or disabling the software;
 - 2) persistent cookies – these are stored in the User's device for the time specified in the cookies parameters or until their removal by the User.

3. All or some of the following types of cookies may be used on the Website:
 - 1) "essential" that allow using the Website,
 - 2) "performance" that allow gathering information about the use of the Website;
 - 3) "functional" that allow saving user-selected settings and customizing the User's interface, e.g. language, font size, website appearance;
 - 4) "advertising" that allow providing the User with more customized advertising content.
4. Cookies files listed in par. 2 and 3 herein are used to:
 - 1) Optimizing the use of the Website; particularly, it enables recognition and display of the Website on the User's Device, customized to their individual preferences;
 - 2) creating statistics that support observing how the Users use the Website, which improves its structure and content.
5. The solutions used on the Website are safe for its Users' Devices.

§ 5. Users' rights

1. The User has the right to access their Personal Data and to correct them at any time.
2. The User has the option to choose the scope and time they want to use the Website and share information about themselves. If for some reason the User does not wish to leave their Personal Data in the Users database, they have the right to request deletion.
3. In the case of consent-based Processing of Personal Data for marketing purposes, the User has the right to withdraw their consent at any time through a statement submitted in writing or by e-mail to the Controller's address: **office@ventureinc.com**.
4. The User has the right to correct, amend, update, rectify data, restrict the processing and request removal of their Personal Data.
5. The User has the right to object to the processing of Personal Data based on purposes arising from legitimate interests pursued by the Controller or by a third party. The Controller is no longer allowed to process such Personal Data, unless he demonstrates the presence of legally valid grounds for processing, overriding interests, rights and freedoms of the User, or grounds for establishing, investigating or defending claims.
6. In order to request rectification, supplementation, updating, correction, restriction of processing, deletion and objection to the processing of one's Personal Data, the User should send a request to the Controller's e-mail address: **office@ventureinc.com** or in write to: **al. gen. J. Hallera 180/14, 53-203 Wrocław**.
7. Should the Controller process their Personal Data in an unlawful manner, the User has the right to lodge a complaint with the Inspector General for Personal Data Protection.
8. The User has the ability to limit or disable cookies in their Device. If they use this option, the use of the Website will be possible, except for functions which, by their nature, require cookies.
9. The User may change their cookie files settings at any time. In particular, these settings can be changed in such a way as to block the automatic handling of cookies in your web browser configuration (instructions on blocking cookies: <https://www.howtogeek.com/63721/how-to-block-all-cookies-except-for-sites-you-use/>) or to inform whenever cookies are saved on the

User's Device. Detailed information on the possibilities and ways of handling cookies available in the Software settings.

10. The User may remove cookies at any time using the features available in their web browser.

§ 6. Disclosure requirement

1. The Personal Data Controller is VENTURE INC SPÓŁKA AKCYJNA based in Wrocław, al. gen. J. Hallera 180/14, 53-203 Wrocław, registered in the Register of Entrepreneurs kept by the District Court for Wrocław-Fabryczna in Wrocław, 6th Commercial Division of the National Court Register under KRS No.: 0000299743, NIP No.: 8992650810, REGON: 020682053.
2. Due to the lack of a legal obligation to appoint a Data Protection Officer for the activities of the Data Controller, no Data Protection Officer has been appointed. In matters related to the protection of their Personal Data, the User may use the contact form at www.ventureinc.com/contact; e-mail: office@ventureinc.com phone: +48 518 860 217; or in writing to the address of our registered office indicated in §6 point 1.
3. The User's Personal Data are processed based on their consent. Data processing takes place in order to perform the Agreement, make financial settlements and for marketing purposes.
4. The categories of Personal Data processed are specified in § 3 points 4 and 5 of this Privacy Policy.
5. The Data Controller may share the User's Personal Data with the Recipients of Personal Data, i.e. persons authorized by the Controller to process data in the course of performing their duties, operators entrusted with the execution of Project activities and IT, accounting, HR, legal and tax administration of the Controller, in particular based on agreements for entrusting the processing of personal data, where personal data is only transferred to the extent that it is necessary to achieve the given purpose.
6. The Data Controller does not transfer the User's Personal Data outside the European Economic Area.
7. The User's personal data shall be retained for as long as they are necessary for the proper performance of the Agreement, or until the User has withdrawn their consent to data processing.
8. In connection with the processing of Personal Data, the User has the following rights:
 - a. The right to access one's data and receive a copy thereof;
 - b. The right to rectify (amend) one's data;
 - c. The right to delete data – if the User believes that there are no grounds for the Controller to process their data, the User may request that the Data Controller delete it;
 - d. The right to demand restriction of data processing – the User may request that the Data Controller restricts the processing of their personal data in the following cases:
 - i. The User questions the accuracy of personal data – for a period allowing the Controller to check the accuracy of such data;
 - ii. the processing is unlawful and at the same time the User does not agree to the deletion of data;
 - iii. The Data Controller no longer needs personal data for the established processing purposes, but they are needed by User to establish, assert or defend claims.
 - e. The right to transfer data – the User has the right to receive their Personal Data from the Controller in a structured, commonly used machine-readable format, or to request the Data Controller to transfer this data to another entity;
 - f. The right to lodge a complaint to the supervisory body – if the User believes that the Data Controller processes their data in an unlawful manner, they may submit a complaint to

- the President of the Office for Personal Data Protection or another competent supervisory authority;
- g. The right to withdraw consent to the processing of personal data – the User has the right to withdraw consent to the processing of personal data that the Data Controller processed based on consent at any time. Withdrawal of consent shall not affect the lawfulness of processing made on the basis of the User’s consent prior to such withdrawal.
 - h. In order to exercise your rights, please send your request to the e-mail address, postal address or call the phone number specified in §6 item 2.
9. The User’s personal data is also processed in an automated manner, which means that the Personal Data Controller makes decisions in an automated manner based on the User’s data which he has (including profiling). The basis for the automated processing of Personal Data involves:
- a. within the scope of the Agreement – article 6 par. 1 point b) GDPR;
 - b. within the scope of marketing goals – article 6 par. 1 point f) GDPR.
10. In case of questioning the legitimacy of the Controller’s assessment of the situation, the User has the right to file a complaint regarding the automated processing of Personal Data for marketing purposes. Complaints may be submitted via the communication channels indicated in §6 par. 2. The complaint will be addressed by a person of appropriate competences and authorized to make decisions.
11. The Data Controller informs that the User’s provision of data is voluntary.

§ 7. Final provisions

1. The Website may contain links to other websites. Such websites operate independently of the Controller and are not supervised by him in any way. These sites may have their own privacy policies and rules that we recommend to read.
2. Please send any and all questions and reservations regarding this Privacy Policy via e-mail to the address: **office@ventureinc.com**.
3. The Controller reserves the right to change this Privacy Policy.
4. Any changes to the Privacy Policy shall be communicated to Users on the Website seven days in advance.