

Privacy Policy of the Online Service

<https://anicura.bt-app.pl/>

1. Personal Data Administrator

The administrator of personal data for the online service available at <https://anicura.bt-app.pl/>, hereinafter referred to as the Online Service, is BT GROUP sp. z o.o., located at ul. Wielicka 181A, 30-663 Kraków, registered in the National Court Register under KRS number: 0000973632, NIP: 6793239904, REGON: 522107120, hereinafter referred to as the Personal Data Administrator.

2. Personal Data Inquiries

All inquiries, requests, or complaints regarding the processing of personal data by the Personal Data Administrator, hereinafter referred to as Inquiries, should be directed to the following email address: anicura@bt-app.pl or in writing to ul. Wielicka 181A, 30-663 Kraków. The Inquiry should clearly specify:

- a. The data of the person(s) the Inquiry concerns,
- b. The event that is the reason for the Inquiry,
- c. The requests and the legal basis for these requests,
- d. The preferred method of resolving the matter.

3. Personal Data Collected in the Online Service

In our Online Service, we collect the following personal data:

- a. **Name and surname** – may be processed when you provide them via email, telephone contact, the contact form available in our Online Service, or by traditional mail.
- b. **Phone number** – may be processed in the case of telephone contact, as well as when you provide it via email, the contact form available in our Online Service, or by traditional mail.
- c. **Email address** – may be processed when you provide it via email, the contact form available in our Online Service, by traditional mail, or during telephone contact.
- d. **IP address of the device and potential personal data contained in Cookies** – information resulting from general principles of internet connections, such as IP address (and other information contained in system logs), is used for technical and statistical purposes, including collecting general demographic information (e.g., about the region from which the connection occurs). This type of data is also used for marketing

and analytical purposes if consent is given under Article 173(1) of the Telecommunications Law.

- e. **Other data** – may be collected in the course of handling specific matters or may be provided by users of our Online Service via email, the contact form available in the Online Service, traditional mail, or during telephone contact.

4. Choice of Using the Online Service

Every person using our Online Service has the option to choose whether and to what extent they want to use our services and share information and data about themselves, as specified in this Privacy Policy.

5. Purpose of Processing Personal Data

We process personal data for the purpose of:

- a. **Concluding and performing contracts** related to the services we offer (Article 6(1)(b) of the GDPR) – in this scope, data will cease to be processed upon the fulfillment of the respective contract.
- b. **Managing individual user accounts** (Article 6(1)(b) of the GDPR) – in this scope, personal data will cease to be processed when the user deletes their account.
- c. **Fulfilling legal obligations** incumbent on the Personal Data Administrator, particularly maintaining documentation, issuing invoices, etc. (Article 6(1)(c) of the GDPR) – in this scope, personal data will be deleted after fulfilling the specified legal obligations.
- d. **Directing marketing content** concerning the Administrator and conducting website analytics related to the use of cookies (Article 6(1)(a) of the GDPR) – in this scope, personal data is processed until the end of the session or the deletion of cookies by the user, withdrawal of consent, or until an effective objection to processing for this purpose is raised.
- e. **Operating the website** (Article 6(1)(f) of the GDPR in conjunction with Article 173(1) of the Telecommunications Law) – in this scope, personal data will cease to be processed upon the expiration of the cookie, deletion of cookies, or upon the end of the respective session.
- f. **Ongoing communication** related to the functioning of the Online Service (Article 6(1)(f) of the GDPR, i.e., the legitimate interest of the Personal Data Administrator) – in this scope, your personal data will cease to be processed once the respective question or questions have been answered.
- g. **Establishing and pursuing claims or defending against such claims** (Article 6(1)(f) of the GDPR, i.e., the legitimate interest of the Personal

Data Administrator) – in this scope, personal data will be deleted upon the expiration of the respective claims, generally after a 3-year limitation period.

6. Source of Processed Data

The source of the personal data processed by the Personal Data Administrator is the individuals to whom the data pertains.

7. Joint Data Administration

In the case of a button or function that links to an external service, application, or social media, there is a joint administration relationship between the Administrator of this Online Service and the administrator of the external site. Joint administration is limited solely to data necessary for operations related to the functioning of the respective button or function. The Administrator is not responsible for the policies regarding further processing of personal data by other entities and organizations or social media service providers. Our joint administrators within this Online Service are: Google Ireland Ltd. (YouTube, Google Maps) located at: Google Building Gordon House, 4 Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Ireland.

8. Google Tools

The Administrator uses tools from Google Ireland Ltd (Google Analytics, Google AdSense). Generally, data processed in the course of using these tools is processed on servers located within the EEA. However, entities providing these tools may be required to transfer data to third countries if such an obligation is imposed on them by law or is necessary due to the nature of the services provided (SaaS, hosting, etc.). The scope of personal data transferred in this regard relates solely to potential personal data contained in cookies. The legal bases for processing personal data mentioned in the previous sentence are specified in point 5(d) and (e) of this Policy. The transfer of personal data to the United States is based on the European Commission's Decision of 10.07.2023 on the adequacy of the protection provided by the EU-U.S. Data Privacy Framework (Article 45(1) of the GDPR). Our data-importing entities, i.e., Google Ireland, meeting the criteria of the decision and participating in the Data Privacy Framework program, are listed at: <https://www.dataprivacyframework.gov/s/participant-search>. The aforementioned entities may transfer data to third countries based on Standard Contractual Clauses adopted by these entities.

9. Sharing Personal Data

We do not share any personal data with third parties without the explicit consent of the person to whom the data pertains. Personal data may be shared without the consent of the person to whom the data pertains only with public law entities, i.e., authorities and

administration bodies (e.g., tax authorities, law enforcement agencies, and other entities authorized by generally applicable law).

10. Entrusting the Processing of Personal Data

Personal data may be entrusted for processing to entities that process such data on our behalf as the Data Controller. In such cases, as the Data Controller, we enter into a personal data processing agreement with the data processor. The processor processes the entrusted personal data solely for the purposes, to the extent, and for the objectives specified in the agreement referred to in the previous sentence. Without entrusting personal data for processing, we would not be able to conduct our business within the Online Service. As the Data Controller, we entrust personal data for processing in particular to the following entities:

- providers of hosting services for the website on which our Online Service operates.

11. Profiling of Personal Data

We, as the Data Controller, do not subject personal data to profiling within the meaning of the GDPR provisions.

12. Users' Rights

Pursuant to the GDPR, each individual whose personal data we process as the Data Controller has the right to:

- access their personal data, as referred to in Article 15 of the GDPR,
- be informed about the processing of personal data, as referred to in Article 12 of the GDPR,
- correct, supplement, update, or rectify their personal data, as referred to in Article 16 of the GDPR,
- withdraw consent at any time, as referred to in Article 7(3) of the GDPR,
- have their data erased ("right to be forgotten"), as referred to in Article 17 of the GDPR,
- restrict processing, as referred to in Article 18 of the GDPR,
- data portability, as referred to in Article 20 of the GDPR,
- object to the processing of personal data, as referred to in Article 21 of the GDPR,
- in the case where the legal basis for processing is consent – the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal,

- not be subject to profiling, as referred to in Article 22 in conjunction with Article 4(4) of the GDPR,
- lodge a complaint with the supervisory authority (i.e., the President of the Personal Data Protection Office), as referred to in Article 77 of the GDPR.

13. Exercising Users' Rights

If you wish to exercise your rights as mentioned in the previous section, please send a message via email or in writing to the contact details specified in Section 2 above.

14. Personal Data Security Breaches

Every identified case of a data security breach is documented, and if one of the situations specified in the GDPR or the Act occurs, the persons affected by the breach and – if applicable – the President of the Personal Data Protection Office (PUODO) are informed.

15. Cookie Policy

The Cookie Policy is a separate document available at: anicura.bt-app.pl/polityka-cookies.

16. Application of Legal Provisions

In matters not regulated by this Privacy Policy, the provisions of generally applicable law shall apply. In the event of any conflict between the provisions of this Privacy Policy and the aforementioned laws, the latter shall prevail.