

Privacy Policy of Service- Champ dated 01/02/2024

Definitions of Terms Used in the Regulations

Administrator / Compono - Compono Solutions sp. z o.o. with its registered office in Łódź (90-057), ul. Sienkiewicza 85/87 lok 8, entered into the Register of Entrepreneurs of the National Court Register kept by the Łódź Śródmieście District Court in Łódź, XX Commercial Division of the National Court Register under KRS number: 0001037656, having the Tax Identification Number (NIP): 7282873434, REGON: 525367642, with share capital of: 10,000.00 PLN.

Personal data - information about a natural person identified or identifiable through one or multiple specific factors determining their physical, physiological, genetic, mental, economic, cultural, or social identity, including device IP, internet identifier, and information collected through cookies and other similar technologies.

Candidate - refers to a natural person who (i) expresses the intention to undertake work or cooperation with the Partner and submits an application through the Service, and (ii) creates an account on the Service.

Partner - refers to a natural person, a legal person, or an organizational unit that is not a legal person engaged in an economic activity, intending to establish cooperation or hire an employee, and who submits a job advertisement or creates an account on the Service.

Policy - this Privacy Policy.

Processing of Personal data - refers to an operation or set of operations performed on Personal Data or sets of Personal Data, whether automated or non-automated, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or any other form of making available, alignment or combination, restriction, erasure, or destruction.

Regulations - refers to the Regulations for the provision of electronic services within the Service operated at the address: www.champyourlife.com/polityka-prywatnosci/en.

GDPR - regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and the free movement of such data, and repeal of Directive 95/46/WE.

Service - refers to the website operated by Compono.

User, Users - refers to any individual who uses the services offered by the Service.

Trusted Partner - entity to whom the Administrator transfers Personal Data based on appropriate contractual clauses, Binding Corporate Rules, or the EU-U.S. Data Privacy Framework mechanism. The list of Trusted Partners is available at: www.champyourlife.com/polityka-prywatnosci/en.



General Rules

- In connection with Candidates' and Partners' use of the Service, the Administrator collects Personal Data
 to the extent necessary for the provision of individual services offered. Specific services are detailed
 below, along with the principles and purposes of processing Personal Data collected during the use of the
 Service.
- 2. Compono respects the right to privacy and the protection of the Personal Data of Candidates and Partners. All Personal Data is processed in accordance with the provisions regarding personal data protection, especially the GDPR, and in accordance with this Policy.

Purpose of Processing Personal Data

- 1. The scope of Personal Data required to perform a given service is always specified in advance on the Service. The extent of Data may also be indicated in the Policy.
- 2. Providing certain data is a condition for using specific services and functionalities of the Service (mandatory data). The consequence of not providing this data is the inability to provide certain services and functionalities of the Service.
- 3. The purpose of collecting and processing personal data by Compono are as follows:
 - a. providing electronic services in the scope of making content collected on the Service available to Users (necessity of processing for the performance of the contract, Art. 6(1)(b) of the GDPR);
 - b. establishing and pursuing claims or defending against claims (legitimate interests pursued by the Administrator, Art. 6(1)(f) of the GDPR);
 - c. contacting the Administrator using an electronic contact form (execution of a service contract, Art. 6(1)(b) of the GDPR; for data provided voluntarily, the legal basis for processing is consent, Art. 6(1)(a) of the GDPR);
 - d. creating statistics on the use of the Service's sites and profiling for advertising, market research, and analyzing User behavior and preferences, with the purpose of utilizing the research results to enhance the quality of services provided by the Service (User consent, Art. 6(1)(a) of the GDPR);
 - e. conducting marketing activities for products and services of the Administrator. Personal Data is processed:
 - i. in order to send requested commercial information (legitimate interests pursued by the Administrator in connection with the given consent);
 - ii. for analytical and statistical purposes (legitimate interests pursued by the Administrator, Art. 6(1)(f) of the GDPR).
- 4. Apart from data marked as mandatory, providing other data is voluntary.

Recipients of Personal Data

- 1. In connection with the provision of services on the Service, Personal Data may be disclosed to external entities. For the purpose of providing ordered services and ongoing support, User data may be transferred for processing to specialized entities.
- 2. Data may be entrusted, in particular, to:
 - a. IT service providers, including data processing services in the cloud,
 - b. marketing service providers, including data analysis services,
 - c. entities responsible for payment processing,
 - d. service providers in the areas of legal, tax, and accounting advisory, consultants, and other providers of specialized services,
- 3. The Administrator provides User data to authorized state authorities if they request it from the Administrator in connection with activities performed. These may include public administration bodies, such as the Police, the President of the Personal Data Protection Office, or the President of the Office of Competition and Consumer Protection.



Further Processing of Personal Data

- 1. The level of protection of Personal Data outside the European Economic Area (EEA) may differ from that provided by regulations in force within the European Union. The Administrator transfers Personal Data outside the EEA only when necessary and with the assurance of an appropriate level of protection, primarily through:
 - a. cooperation with entities processing Personal Data in countries for which the European Commission has issued an adequacy decision regarding the level of protection of Personal Data;
 - b. in the case of transferring Personal Data to the USA using the EU-U.S. Data Privacy Framework to certified organizations in the United States;
 - c. the use of standard contractual clauses issued by the European Commission;
 - d. the implementation of binding corporate rules approved by the relevant supervisory authority.
- 2. The Administrator provides information about the intention to transfer Personal Data outside the EEA during the data collection stage.

Duration of Personal Data Processing

- 1. The duration of data processing by the Administrator depends on the type of provided service and the purpose of processing. As a general rule, data is processed for the duration of service provision.
- 2. The period of retention for Personal Data is determined individually and depends, among other factors, on the nature of the data and the reason for their collection and processing. After this period, the data is either erased or anonymized.
- 3. Personal Data will be processed for the duration of the legal basis for their processing, i.e.:
 - a. in the event of granting consent, until its withdrawal, restriction, or other actions by the User that limit such consent.
 - b. in the case of the necessity of data for the performance of a contract, for the duration of its execution, and until the expiration of the limitation period for claims arising from that contract (3 years or 6 years). The commencement of the limitation period is calculated from the day the claim falls due,
 - c. in the case where the processing of data is based on the legitimate interests of the Administrator until the User effectively raises an objection,
 - d. for tax and accounting purposes to the extent and for the time required by applicable regulations.
- 4. The data processing period may be extended when processing is necessary to establish and pursue potential claims or defend against claims, and beyond this period only if required by legal regulations. Following the expiration of the processing period, the data is permanently erased or anonymized.

User Rights

- 1. The User has the right to access the content of their data and to request their correction, deletion, processing restriction, the right to data portability, and the right to lodge a complaint with the supervisory authority responsible for the protection of Personal Data.
- 2. The User also has the right to object to the processing of data that is based on the legitimate interests pursued by the Administrator.
- 3. To the extent that User data is processed based on consent, this consent can be withdrawn at any time by contacting the Administrator through: privacy@champyourlife.com.

Security

- 1. Compono makes every effort to ensure that Personal Data is processed in accordance with applicable legal regulations and is protected against loss, destruction, disclosure, unauthorized access, or improper use.
- Compone guarantees the confidentiality of all data and information entrusted to it, particularly by implementing effective security measures and safeguards for Personal Data, as well as by carefully selecting further data processing entities.



- Compono conducts risk analysis to ensure that Personal Data is processed by it in a secure manner, primarily by ensuring that access to data is granted only to authorized individuals and only to the extent necessary for the activities performed.
- 3. Compono ensures that all operations involving Personal Data are registered and performed only by authorized employees and collaborators.
- 4. Compone takes all necessary actions to ensure that its Trusted Partners, subcontractors, and other cooperating entities also provide guarantees of implementing appropriate security measures whenever they process Personal Data on behalf of the Administrator.

Final Provisions

- 1. For matters related to the Policy, please contact us at: privacy@champyourlife.com.
- 2. Compono reserves the right to modify the Policy in the future. This may occur for specific reasons, including:
 - a. changes in applicable regulations, particularly with regard to generally applicable law provisions;
 - b. changes in the ability to transfer data to third parties;
 - c. changes in the functionality of the Service.
- 3. In the event of a Policy change, its new content will be announced on the Service's pages.
- 4. Matters not regulated in the Policy shall be governed by the provisions of the GDPR and the mandatory provisions of the law of the territory of the Republic of Poland.