

PRIVACY POLICY OF BLACKBIRD GROUP AND BLACKBIRD ACADEMY SP. Z O.O.

§ 1 General Provisions

1. Data Controller shall use their best efforts to make sure that Personal Data will be processed by them with full respect for privacy of the persons whose data is processed and with the utmost attention to security of the processed Personal Data, and shall ensure specifically that appropriate measures prescribed by law were applied to guarantee security of Personal Data.
2. Data Controller hereby declares that they apply technical and administrative measures ensuring protection of processed Personal Data adequate to threats and categories of data under protection, and shall specifically protect the data from unauthorised access, being taken by an unauthorised person and processed in violation of the Act, as well guard it against change, damage or destruction.
3. This document was developed on the basis of the 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 (General Data Protection Regulation) (hereinafter referred to as "GDPR"), the Act of 10 May of 2018 on Personal Data Protection (Journal of Laws of 2018, item 1000), the Act of 18 July 2002 on Providing Services by Electronic Means (Journal of Laws of 2002, No. 144, item 1204) and other generally applicable provisions of law.
4. Should you have any questions concerning personal data protection, please contact Marcin Obuchowski at: office@hello-blackbird.com.

§ 2. Personal Data Processing

1. Companies Blackbird Group Sp. z o.o (NIP 5252507793, REGON 142959445) and Blackbird Academy Sp. z o.o (NIP 5252678419, REGON, 365533966) with a registered office in Warsaw, ul. Niepodległości 124/7, 02-577 Warsaw are Personal Data Controllers.
2. Users' Personal Data shall be processed for the purpose of provision of services as part of the classes, trainings and webinars delivered via platforms Evenea.pl and ZOOM, www.hello-blackbird.com, for marketing purposes and in the case of making necessary financial settlements. Legal basis for data processing shall be provided by respectively: 1) Article 6, section 1, a) of GDPR, i.e. User's consent – inter alia, in the case of data processing for marketing purposes after the end of the duration period of the contractual relationship between User and Data Controller, as well as in another scope defined each time in the content of the consent expressed by User; 2) Article 6, section 1, b) of GDPR, i.e. necessity for contract performance, i.e. organisation of training for administrators, consultation for administrators, conferences for administrators or e-book sharing; 3) Article 6, section 1, c) of GDPR, i.e. necessity for fulfilment of a legal obligation of the Data Controller; 4) Article 6, section 1, f) of GDPR, i.e. legitimate interests of Data Controller, specifically such as providing information on pre-release order of a book, direct marketing of services and products offered by Data Controller, newsletter distribution, contact made upon User's request, securing of evidence for the protection against claims or establishing and asserting claims due to business activity, sending personal data for internal administrative purposes, assessment of quality of services, market research, for statistical purposes, specifically for evaluation of the level of interest in the content published by us and improvement of

provided services. Personal data may be processed for the purposes of direct marketing until an objection is raised against such processing.

3. Provision of Personal Data is voluntary, but necessary to be able to benefit from services offered by Data Controller or participate in the events organised by Data Controller. In the case of failure to provide personal data, User may not receive a benefit resulting from the service provided by electronic means or receive it in a reduced scope.
4. Data Controller processes or may process the following User's Personal Data which can be provided by User voluntarily: 1) first name and surname, 2) e-mail addresses, 3) telephone number, 4) IP address. 5. Data Administrator shall store Personal Data in Users' database in order to make organisation of trainings and webinars easier.
5. Personal Data shall be retained for period necessary to accomplish the aforementioned objectives, i.e. in the case of data processing on the basis of: 1) Article 6, section 1, a) of GDPR, i.e. User's consent – until the withdrawal of such consent by User, and later for the period necessary to secure possible claims according to claims' periods of prescription specified in the Civil Code; 2) Article 6, section 1, b) of GDPR, i.e. necessity for contract performance – until the contract fulfilment and for the period necessary to secure possible claims according to claims periods of prescription specified in the Civil Code; Article 6, section 1, c) of GDPR, i.e. necessity for fulfilment of a legal obligation of Data Controller – until this obligation has been fulfilled and for the period necessary to secure possible claims according to claims' periods of prescription specified in the Civil Code; 4) Article 6, section 1, f) of GDPR, i.e. legitimate interest of Data Controller – as long as such legitimate interest exists.
6. Personal Data recipients are persons authorised by Data Controller to process data as part of their official duties, entities assigned by Data Controller to activities which are associated with the necessity of data processing (processing entities). Personal Data may be shared with entities charged with bookkeeping by Data Controller, entities operating enterprises specialised in business process services, e.g. IT support.
7. Data Controller shall respect the following rules for Personal Data processing: 1) implementation of appropriate technical and administrative measures to ensure that processing complies with provisions concerning Personal Data protection and making sure that this compliance can be demonstrated; 2) recording of collected Personal Data solely by means of such information storage devices which are secured against unauthorised access of the third parties; 3) overseeing security of Personal Data for the entire period of being in possession of such data, in a manner guaranteeing specifically protection against any unauthorised access, damage, destruction or loss; 4) transferring of the data to authorised entities solely on the basis of applicable provisions of law; 5) maintaining confidentiality of Personal Data; 6) ensuring that the data subjects' rights arising from provisions of law are exercised.
8. User whose Personal Data is processed has the right to request access to such data from Data Controller, as well as request rectification, erasure, restriction or raise an objection to processing of personal data, pursuant to § 6 of this Policy.

9. In the case of Registration via a Facebook profile, Data Controller may process Users' Personal Data stored in their Facebook profiles according to privacy settings selected for respective Users, including specifically the following Personal Data: e-mail addresses, telephone numbers, location data, image, first name and surname, FB Messenger ID, profile picture, time zone or sex.
10. In the case of Registration via a profile set up on Evenea portal, Data Controller may also process Users' Personal Data stored in their profiles on Evenea portal at: <https://evenea.pl>.

§ 4. Newsletter

1. Newsletter is an electronic service consisting in delivery of information by Data Controller on their service offering. To be sent a Newsletter from Data Controller, User must agree to receive it.
2. User must first read Privacy Policy to be able to use the Newsletter service. Data Controller determines the dispatch date and content of a Newsletter.
3. User may opt out of the Newsletter service at any given moment by clicking on a deactivating link included in each e-mail containing a Newsletter sent to User or by submitting such request to Data Controller.

§ 5. Cookies

1. Data Controller uses Cookies via Portal.
2. Website uses two primary kinds of Cookies: 1) session cookies – temporary files stored on User Device until User logs out, leaves Portal or switches Software off; 2) persistent Cookies – files stored on User Device for the period specified in Cookies' parameters or until they are deleted by User.
3. Portal may use all or some of the following Cookies: 1) 'strictly necessary' Cookies which allow the use of services available on Portal, 2) 'performance' Cookies allowing for gathering of information on the ways in which Portal's sites are used; 3) 'functional' Cookies allowing for saving of the settings selected by User and personalisation of User interface, e.g. through language, font size, site layout; 4) 'advertising' Cookies allowing for tailoring of delivered advertising content to User's interests.
4. Cookies described in sections 2 and 3 of this paragraph are used to: 1) adapt Portal's content to User's preferences and optimise content use; specifically, it allows for Portal detection and display on User Device, adapted to their individual preferences; 2) create statistics that support observations on how Users use Portal, which helps improve Portal's structure and content; 3) to maintain User's session on Portal so that User does not have to re-enter their login and password each time they visit Portal's sub-sites, and products are saved once they have been added to a cart.
5. Solutions used on Portal's website are safe for Devices of Users visiting the website.

§ 6 Rights of Users

1. User has the right to access their Personal Data and rectify it at any moment in time.

2. User can choose to what extent and in what time they want to use Portal and share information about themselves. If for some reason User does not wish to have their Personal Data retained in Users' database, they have the right to request erasure of such data.
3. In the case of Personal Data processing on the basis of a granted consent, Data Subject has the right to withdraw their consent at any moment in time by submitting a statement in writing or by an e-mail sent to: office@hello-blackbird.com. Withdrawal of the consent does not affect the lawfulness of processing based on consent before its withdrawal.
4. User has the right to amend, complete, update, rectify, restrict processing, transfer and request erasure of their Personal Data.
5. User has the right to object to Personal Data processing based on purposes arising from legitimate interests pursued by data Controller or third party. Data Controller is no longer allowed to process such Personal Data unless they prove legally effective and legitimate grounds for processing overriding User's interests, rights and freedoms, or grounds for establishing, asserting or defending claims.
6. To amend, complete, update, rectify, erase or object to processing of their Personal Data, User should send a request to Data Controller by an e-mail.
7. User has the right to make a complaint to the President of the Personal Data Protection Office (UODO) if Data Controller fails to process their Personal Data according to law.
8. User can restrict or block Cookies on their device. Should they use this option, they can still use Portal, but some of its functionalities requiring Cookies may be disabled.
9. Portal User can change the Cookie settings at any moment in time. These settings can be changed specifically in such a way as to disable automatic support for Cookies in the browser settings or to send a notification message each time Cookies are placed on Portal User's Device. More information on support for Cookies is available in Software settings.
10. User can clear Cookies at any moment in time by using functionalities available in their browser.

§ 7 Changes to this policy

1. Blackbird Group and Blackbird Academy Sp. z o.o. will occasionally update this Privacy Policy in response to: 1) customer feedback 2) company changes and new products 3) evolving legal requirements.
2. When we update the Privacy Policy we will notify you by email and we will include notification on our website. The updated document shall be stamped with the update date and time.