

## PRIVACY POLICY

As a responsible organisation that is aware that information has a certain value and is a resource that requires proper protection, we want to duly inform you about matters related to the processing of personal data, especially in view of the content of new data protection legislation, including 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; GDPR). Therefore, in this document we provide key information about the legal basis for processing personal data, the methods of their collection and use, and the rights of data subjects.

### 1. About us

Please be advised that the controller of your personal data is **DIGITAL PATHOLOGY TEAM WITOLD REZNEER SPÓŁKA KOMANDYTOWA** ul. Karczówkowska 45, 25-713 Kielce, hereinafter referred to as the "Controller". Personal data is obtained and processed in the manner and on the terms set out in this Policy.

### 2. General provisions

We attach particular importance to protecting the privacy of our customers, contractors, employees and associates. One of its key aspects is the protection of the rights and freedoms of individuals in connection with the processing of their personal data.

We ensure that the processing of your data is carried out in accordance with the provisions of the General Data Protection Regulation 2016/679/EC (hereinafter: "GDPR"), the Personal Data Protection Act, as well as specific regulations (included, among others, in the Labour Law or the Accounting Act).

**DIGITAL PATHOLOGY TEAM WITOLD REZNEER SPÓŁKA KOMANDYTOWA** is a Controller of personal data within the meaning of Art. 4 (7) GDPR. We also use the services of processors referred to in Art. 4 (8) GDPR - they process personal data on behalf of the Controller (these are e.g. IT and hosting companies).

The company implements appropriate technical and organisational measures to ensure a level of security appropriate to the possible risk of infringement of the rights or freedoms of individuals with different probability of occurrence and severity of the

threat. Our personal data protection measures are based on adopted policies and procedures and regular training to improve the knowledge and competence of our employees and associates.

### 3. Use of personal data

As an employer, we process the data of employees and people who cooperate with us on a basis other than employment. Contact data collected from contractors (e.g. data of their employees) is used for the conclusion and efficient execution of contracts. We use our clients' data for the purpose of performing contracts and providing our services. We also conduct marketing activities and in this context we try to reach as many interested parties as possible in order to provide them with up-to-date information about our products and services. We share your data with third parties with your consent or when we are obliged to do so by law.

### 4. How we process your data

We take care to protect the interests of the data subject, and in particular we ensure that the data is:

- processed lawfully, fairly and in a transparent manner for the data subject;
- collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
- adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- accurate and, where necessary, updated. We take steps to ensure that personal data which is inaccurate in light of the purposes for which it is processed is erased or rectified without delay;
- stored in a form which permits identification of the data subject for no longer than is necessary for the purposes of the processing;
- processed in a way which ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and accidental loss or destruction.

We normally process your data on the basis of your consent, which can be withdrawn at any time. Another case is where the processing of your data is necessary for the performance of a contract to which you are party or to take action at your request, even before the conclusion of the contract.

In some situations, the processing is necessary for the fulfilment of a legal obligation incumbent on us as a Controller. Such obligations arise, for example, from the provisions of the Labour Law or the Accounting Act.

Processing may also be necessary for purposes arising from our legitimate interests, an example of which is the assertion of claims from our business activities.

## 5. Your data protection rights

We take appropriate measures to provide you with all relevant information in a concise, transparent, understandable and easily accessible form and to conduct all communications with you regarding the processing of your personal data in connection with the exercise of your right to:

- information provided when your personal data is collected;
- information provided on request - about whether data is being processed and other matters specified in Article 15 of the GDPR, including the right to a copy of the data;
- rectification of data;
- being forgotten;
- restriction of processing;
- data portability;
- objection;
- not being subject to a decision based solely on automated processing (including profiling);
- information about a data protection breach.

In addition, if your personal data is processed on the basis of consent, you have the right to withdraw it. Such consent may be withdrawn at any time, which does not affect the lawfulness of the processing carried out before its withdrawal.

To contact us regarding the exercise of the right in question, please contact us via:

Email address: **[contact@digitalpathologyteam.com](mailto:contact@digitalpathologyteam.com)**

Correspondence address: ul. Karczówkowska 45, 25-713 Kielce

The security of your data is our top priority, however, if you feel that we violate the provisions of the GDPR by processing your personal data, you have the right to lodge

a complaint with the President of the Data Protection Authority (the authority competent for the protection of personal data in Poland).

## 6. How we will contact you

We will provide information in writing or by other means, including, where appropriate, electronically. If you request it, we may provide the information orally, if we can confirm your identity by other means. If you communicate your request electronically, the information will also be provided electronically where possible, unless you indicate another preferred form of communication.

## 7. Fulfilment of requests

We endeavour to provide information without delay - in principle within one month of receiving the request.

If necessary, this period may be extended by a further two months due to the complexity of the request. However, in any event, within one month of receipt of your request, we will inform you of the action taken and (if applicable) of the extension and the reason for such delay.

## 8. Subcontractors/processors

If we work with entities that process personal data on our behalf, we only cooperate with such processors that provide sufficient guarantees to implement appropriate technical and organisational measures so that the processing meets the requirements of the GDPR and protects the rights of data subjects.

We check in detail the entities to which we entrust the processing of your data. We conclude detailed agreements with them, and we periodically check the compliance of the processing operations with the content of such agreements and the provisions of law.

The recipients of your personal data may be:

- entities and bodies authorised to process personal data on the basis of legal provisions;
- banks in the case of the need to conduct settlements;
- institutions granting funds for the purpose of performance of the contract concluded with the Controller;

- company providing IT and hosting services.

## 9. How we take care of the processing of your data

To meet the requirements of the law, we have developed detailed procedures covering issues such as:

- data protection by design and data protection by default;
- data protection impact assessment;
- breach notification;
- keeping a register of data processing activities;
- data retention;
- exercising the rights of data subjects.

We regularly review and update our documentation to be able to demonstrate compliance with the requirements of the law in accordance with the principle of accountability formulated in the GDPR, but also, out of concern for the interests of data subjects, we strive to incorporate the best market practices.

## 10. Data retention

We retain personal data in a form which permits identification of the data subject for no longer than is necessary for the purposes for which the data is processed. After such a period, we either anonymize (de-identify) or delete the data. In the retention procedure we ensure that the storage period of personal data is limited to the strict minimum.

The data processing period is determined first of all on the basis of legal provisions (e.g. retention period of employee records, accounting documents) and the justified interest of the controller (e.g. marketing activities). The retention policy covers both data processed in paper and electronic form.

## 11. Authorizations

We shall ensure that any person acting under our authority who has access to your personal data processes them only on our instructions, unless otherwise required by European Union or Member State law.

## 12. Cookies

### Policy on the use of cookies by the Website

a) Cookies are computer data, in particular text files, which are stored in the terminal equipment of the Website User and are intended for use on the Website. Cookies usually contain the name of the website from which they come, the time of storing them on the terminal equipment and a unique number.

b) The entity placing cookies on the terminal equipment of Website User and gaining access to them is the owner of the website.

c) Cookies are not used to obtain any information about service users or to track their navigation. Cookies used in the service do not store any personal data or other information collected from users and are used for statistical purposes.

d) By default, the software used to browse websites (browser) allows cookies to be served on the User's device on which it is running. In most cases, the software can be configured independently in this respect, including forcing an automatic blocking of cookies. The issues related to the configuration of the handling of cookies are to be found in the software settings. Please note that the settings of restrictions on the handling of cookies may affect the operation of certain functionalities of the website.

e) Cookies are used in order to:

- adjust the content of the Website to User preferences and optimise the use of websites. In particular, these files enable recognition of the Service User's device and appropriate display of the website, adjusted to his/her individual needs;

- create statistics that help us understand how Website Users use our website, which enables us to improve its structure and content;

- maintain the Service User session (after logging in), so that the User does not have to re-enter login and password on each subpage of the Website.

f) There are two basic types of cookies used within the Website: session and persistent cookies. Session cookies are temporary files that are stored in the User's terminal equipment until logging off, leaving the website or switching off the software (web browser). Persistent cookies are stored in the User's terminal equipment for the time specified in the parameters of cookies or until they are deleted by the User.

g) The following types of cookies are used within the Service:

- "necessary" cookies, enabling the use of services available on the Website, e.g. authentication cookies used for services requiring authentication on the Website;

- "security cookies", e.g. used for detecting abuses in the scope of authentication in the Service;
- "analytics" cookies, enabling the collection of information on the use of the Website;
- "functional" cookies enabling "remembering" the settings selected by the User and personalising the User's interface, e.g. with regard to the selected language or region from which the User comes from, font size, website layout etc.

#### Links to other pages placed on the website

The website owner informs that the service contains links to other websites. The website owner recommends getting acquainted with the privacy policies of such websites, as he is not responsible for them.