

## PRIVACY POLICY

Welcome to JustReview's privacy policy.

JustReview respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how JustReview collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for an account or to our newsletter.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

#### CONTROLLER

Mateusz Haber, being the owner of the JustReview brand and conducting business under the name Mateusz Haber JustIdea is the controller and responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

We provide you a service. In doing so, we DO NOT handle personal data you are responsible for (e.g. first names, last names or email addresses of users posting opinions about your company) on your behalf.

Because of this JustReview is not a Processor in terms of GDPR of personal data (Data Subject) for your organization (Controller).

#### CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Mateusz Haber JustIdea

Email address: [contact@justreview.co](mailto:contact@justreview.co)

Postal address: ul. Rakowicka 1, 31-511 Kraków, PL

Telephone number: [+48 888-868-111](tel:+48888868111)

You have the right to make a complaint at any time to the President of the Personal Data Protection Office, polish supervisory authority for data protection issues (<https://uodo.gov.pl/en>). We would, however, appreciate the chance to deal with your

concerns before you approach the Personal Data Protection Office so please contact us in the first instance.

### **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes company name, address, billing address, email address and telephone number.
- **Technical Data** includes IP address, browser type and version, time zone and location settings, plugin types and versions, operating system.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Your consent to the JustReview’s processing of personal data is voluntary but failure to grant the consent to the personal data processing makes it impossible to sign up for an account on JustReview’s website.

**3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect your personal data in the following ways:

<b>Method of collecting data</b>	<b>Type of data</b>
By corresponding with us by post, phone, email, chat on our Website or otherwise.	Identity Data Contact Data
Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.	Technical Data
By signing up for a product on our website.	Identity Data Contact Data

**4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>

To answer your inquiries or contact request sent to us by telephone/email/or in chat on our website	Identity Data Contact Data	Performance of a contract with you
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To process your order for a product or service	Identity Data Contact Data	Performance of a contract with you
To send you information regarding how JustReview works, information about updates	Identity Data Contact Data	Performance of a contract with you
To send you legitimate interest emails	Identity Data Contact Data	Necessary for our legitimate interests (for instance, an email with an invoice, or important legal, privacy and security emails)

### THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **STRIPE PAYMENTS**

We may ask you to provide billing details like your company address and tax information and the person responsible for billing in your organization. The Stripe, Inc. is the processor of this data and Chargebee Inc. is the controller. This data is collected and stored by Chargebee Inc. We do not store it on our servers. We need to ask you for this data due to tax reasons, which will allow us to provide a monthly invoice for your organization. We are obligated to store this data in our invoicing system due to tax regulations in Poland.

### **EMAIL SERVICES**

JustReview has a legitimate interest to send you certain emails, such as:

- Emails with information about how JustReview works. This is also necessary for us to perform a contract with you as such emails allow you to better understand how to use our Services. You can, however, unsubscribe anytime using the “unsubscribe” link in the email sent to you.
- Legitimate interests transactional emails - these are emails we need to send - they contain important information, and sometimes we are legally obligated to send them, for instance an important legal, privacy and security emails (for instance an email with reset password). You cannot unsubscribe from this type of email.

### **COOKIES POLICY**

By accessing our website you are agreeing to our [Cookies Policy](#).

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties, such as:
  - a) payment processing platforms – Stripe Inc. Inc. with registered office in San Francisco, California, United States and Chargebee Inc. with registered office in San Francisco, California, United States;
  - b) accounting firms;
  - c) companies that provide services such as hosting, cloud computing;
  - d) social media platforms;
  - e) the Tax Office;
  - a) and other public authorities in the Republic of Poland.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Our business operations may involve transferring your data outside the European Economic Area (EEA), in particular to companies running social media platforms and search engines, such as Facebook and Google.

When dealing with entities outside of the EEA we ensure that at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission,
- We will apply Standard Contractual Clauses (“SCC”) adopted by the European Commission under the GDPR for the transfer of personal data outside European Union. The SCC set forth the adequate safeguards for the protection of privacy and fundamental rights and freedoms of European individuals for such data transfers.

We also observe the regulatory developments affecting these data transfers to data importers outside the European Union after the CJEU’s “Schrems II” decision of 07/16/20 (C 318/11). Please visit this website frequently for updates of this Policy.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

## **7. DATA SECURITY**

JustReview has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected. We ensure that anyone acting under our authority who has access to the personal data does not process it except on our instructions, unless required to do so by EU or member state law.

## **8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in

respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 5 years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

In certain situations, the you have the right to request us to view, correct, change, limit, rectify or delete your personal data that we administer and the right to object to the processing of your personal data by the us. For this purpose, please send an e-mail to: [contact@justreview.co](mailto:contact@justreview.co).

Please note that we will not always be able to fulfill your request to delete your personal data, namely due to individual legal obligations. In such cases, it will be communicated to you after making such a request. If you would like to receive more information on the individual rights set out in this section, please contact us according to the contact details on the 'Contact' tab.

You have the right to request that we send your personal data, which we administer, to another administrator of personal data, provided that the technical and organizational requirements allow us to conduct such a transfer of data.

JustReview shall, without undue delay - and in any event within one month of receipt of the above mentioned request - provide you with information about actions taken in connection with the request, or about any extension of our deadline for the provision of such information due to the nature of the request or the number of requests. In such case we shall also provide the reasons for the rejection of your request and inform you about the possibility of submitting a complaint to the supervisory body and of taking legal measure before a court.

The exercise of the rights set out above is free of charge. However, JustReview may charge you a reasonable fee if the presented request or requests are obviously unfounded, repetitive or excessive. In such cases, we may also refuse to comply with your request.

In order to meet individual requests, we may request specific information from you in order to verify your identity and ensure the exercise of individual rights. This is a security measure to ensure that personal data is not disclosed to unauthorized persons.

You have the right to make a complaint at any time to the to the President of the Personal Data Protection Office, polish supervisory authority for data protection issues (<https://uodo.gov.pl/en>).

## **10. COMPLAINTS CONCERNING THE WEBSITE**

JustReview, acting with due diligence, urges to ensure the correct operation of the Website, however, it is not responsible for technical restrictions on the ability to use the Website arising from the technical condition of your Equipment (understood as telecommunications equipment belonging to you, such as a mobile phone, smartphone, computer, tablet or other mobile device with access to the Internet) and arising in connection with the failure of data transmission (internet connection).

We ask to please report any irregularities related to the operation of the Website to the following e-mail address: [contact@justreview.co](mailto:contact@justreview.co). We will handle all such complaints within 7 days from the date of their submission. We will inform you about the positive or negative result of the complaint, stating the reasons for our decision.

You are also entitled to use out-of-court complaint settlement methods.

## **11. FINAL PROVISIONS**

JustReview reserves the right to amend this Privacy Policy. Amendments will take place on the day the new Privacy Policy is posted on the Website. Any significant changes to this Policy will be announced by the appearance of an appropriate message on the Website.

The provisions of this Privacy Policy are in accordance with generally applicable law.

If any provisions of this Privacy Policy prove to be invalid or ineffective, it shall not affect the validity or effectiveness of the remaining provisions of this Privacy Policy.

The contact details of JustReview are indicated in the "Contact" tab.

If any of the provisions of the Privacy Policy remain unclear to you, please contact us at: [contact@justreview.co](mailto:contact@justreview.co) or at the phone number indicated in the "Contact" tab.