



USECRYPT

PRIVACY POLICY

Personal data protection has always been given priority by UseCrypt Polska Sp. z o.o. (hereinafter: "UC" "Usecrypt"). Our goal is to promote and ensure data privacy, including but not limited to personal data.

Therefore, we not only comply with the provisions of 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), but we also meet your expectations and inform you about the legal grounds for collecting personal data, processing, as well as about your rights.

When, as an individual, you contact us or use our services, in particular the USECRYPT MESSENGER Application and the USECRYPT SAFE Application regardless of whether you are acting on your own behalf or on behalf of another entity (e.g. your employer, and our Business Customer), or when your data has been provided to us by you (e.g. in connection with the conclusion of a service agreement with the Usecrypt Agent).

This Privacy Policy is intended to explain who we are, how your personal data comes to us and how it is processed as part of Usecrypt's business. Please contact us if anything raises your concerns or needs clarification.

I. Who are we and how to contact us?

The Administrator of Your personal data is Usecrypt Polska Sp. z o.o. with its registered office in Warsaw at Prosta 20 Street, 00-850 Warsaw (hereinafter: 'Administrator' or 'Usecrypt' or 'UC'). In matters related to the processing of your personal data you may contact us by e-mail at admin@usecrypt.com or by post at the following address: Usecrypt Polska Sp. z o.o. Prosta 20 Street, 00-850 Warsaw.

II. What categories of data do we process?

Since your anonymity is the most important thing for us we process only the minimum amount of your data which is necessary for the proper functioning of the Application and resulting from the provisions of RODO, that is:

- (a) information related to your Usecrypt Messenger and Usecrypt Safe Application User Account: When you install the Usecrypt Safe Application and register therein as a user, you provide us with your first name(s) and last name(s), email addresses and phone numbers as an Application user.

By installing the Usecrypt Messenger Application and registering therein as a user you provide us with your phone number. This is the only personal data of yours whose processing is mandatory because it is necessary for the functioning of the Application;

- (b) when using the Usecrypt Messenger Application you may provide us with cryptographic digests of the phone numbers of other users who are in your contact book.

Such data is processed in order to create your contact list and to check their access to the Application. By taking this action, you acknowledge that you have the right to provide us with such data. Importantly for your anonymity and that of other users, we are not able to determine your telephone number from this data;

- c) we do not have access to the content of your messages;

- d) we do not have access to your voice calls in the Usecrypt Messenger application.

III. Cookies

1. The Service does not collect any information automatically except for information contained in cookies.
2. Cookies (so-called "cookies") are computer data, in particular text files that are stored in the final device of the Service User and are designed to use the websites of the Service. 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.
3. Third Entity placing cookies on the Service User's end device and accessing them is the Service operator www.usecrypt.com with headquarters at Prosta 20 Street, 00-850 Warsaw
4. Cookies are used in order to:
 - a) creation of statistics that help to understand how users of the Website use websites, which enables improvement of their structure and content;
 - b) maintaining a session of the Service User (after logging), thanks to which a User does not have to re-enter login and password on each subpage of the Service;
5. Within the Service there are used two basic types of cookies: "session" (session cookies) and "persistent" cookies (persistent cookies). "Session" cookies are temporary files that are stored in the final device of the User until logging out, leaving the website or switching off software (web browser). "Permanent" cookies are stored in the terminal equipment of User for the time specified in the parameters of cookies or until they are removed by the User.
6. The following types of cookies are used within the Service:
 - a) "necessary" cookies making it possible to use services available within the Service, e.g. authentication cookies used for services requiring authentication within the Service;
 - b) cookies used for ensuring safety, e.g. used for detecting abuses in the scope of authentication within the Service;
 - c) "efficiency" cookies enabling gathering information on the manner of use of the Service websites;
 - d) "Functional" cookies enabling "remembering" the settings selected by a User and personalization of the User's interface, e.g. in the scope of a chosen language or region from which a User comes from, font size, appearance of the website etc;
 - e) "advertising" cookies enabling provision of advertising content more suited to the User's interests.
7. Users of the Service may at any time change their settings concerning cookies. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the settings of the Internet browser or inform on their timely placement in the device of the Service User. Detailed information on the possibility and the ways of using cookies are available in the settings of software (web browser).
8. The Service Operator informs that restricting the use of cookies may affect some of the functionality available on the Website.
9. Cookies placed in Service User's end device and used can also be by advertisers and partners cooperating with the Service Operator.
10. More information on cookies is available in the "Help" section in the menu of your web browser.



IV. For what purposes and on what legal basis do we process your personal data?

We process your personal data left in the Application or provided by you (in the process of concluding a Service Agreement through our Agent) in order to:

- (a) to perform the Agreement concluded with you (if it was concluded directly with you), on the basis of Article 6(1)(b) of the RODO;
- b) to pursue our legitimate interest as an Administrator or third party, on the basis of Article 6(1)(f) of the DPA, for:
 - a. the performance of the Agreement concluded with your employer when it is our Business Customer (in the case of service agreements concluded through an Agent);
 - b. to respond to questions asked via the contact form and to conduct other correspondence with you;
 - c. establish, assert or defend claims;

The provision of personal data by you is voluntary, however, at times it may be necessary for the purposes of using our services, e.g. the data may be necessary for the performance of a contract or to respond to an inquiry or for correspondence.

Data related to the provision of services and ensuring their functionality are processed due to the fact that they are necessary to perform UC's obligations towards you. The data may also be processed in individually justified cases on the basis of UC's legitimate interests. When processing data on the basis of a legitimate interest, UC shall, in each case, carefully assess and balance the interests of UC and the interest and potential impact on the data subject. The individual's rights in relation to data protection legislation are also analysed.

For marketing purposes, based on your separate and voluntary consent, UC will process your personal data in order to present information about events and news in the field of data protection and privacy, as well as about goods and services offered by UC, including promotions of goods and services.

Data related to marketing purposes are processed on the basis of the individual's explicit and voluntary consent. Consent can be withdrawn at any time.

In addition to the data referred to above, individuals interested in doing business with UC or purchasing services who contact UC and provide their personal and contact information in order to obtain information about the offer and services or to enter into a contract, may provide UC with their personal data such as: name, phone number, e-mail address. The contact providing personal data via e-mail or telephone is voluntary. We ask, in the first forms of contact, not to provide extensive data, including specific data (e.g. race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, information about physical or mental health, genetic data, biometrics, information about sex life or sexual orientation and criminal past). If contact is made, depending on the type of contact, UC shall take appropriate action related to ensuring that the processing of personal data is lawful.

V. How long do we process your data?

As a general rule, your data will only be processed for as long as is necessary for the purpose for which your data are processed taking into account the law (in particular the period during which you can pursue your claims under civil law).

These periods may be extended as appropriate and necessary, in the case of possible claims and court proceedings - by the duration of these proceedings and their settlement - and also if the legal regulations in certain cases oblige us to process them longer.

VI. Who actually has access to your personal data?

Your personal data is only accessed by:

- (a) duly authorised employees or associates of the Administrator, who are obliged to keep it confidential and not to use it for purposes other than those for which we obtained your data;
- (b) Entities that, on behalf of the Administrator, are involved in the development process of the Application, as well as in the provision of technical support to the Administrator;
- c) Entities and their authorized employees who cooperate with the Administrator on the basis of other agreements.

The aforementioned persons and entities have access to your data in order to perform certain activities. We may also be obliged to provide certain information to public authorities for the purposes of their proceedings. In this case, information is provided only if there is an appropriate legal basis for doing so.

VII. Your rights

You have the following rights:

- access to your data and to receive a copy of your data;
- To rectify your data;
- request the deletion of your data;
- demand restriction of data processing.

In the case of processing of your personal data on the basis of a legitimate interest of the Administrator or a third party, you have the right to object to such processing on grounds specifically concerning you. In order to exercise the above-mentioned rights, please contact us by email at the following email address: biuro@usecrypt.com or by traditional correspondence. If you have doubts about the lawfulness of our processing of your personal data, you have the right to lodge a complaint to the supervisory authority, which in Poland is the President of the Office for Personal Data Protection.

VIII. Change of Privacy Policy

We would like to inform you that our Privacy Policy may be changed in the future in order to adjust it to your expectations and requirements imposed by law. The new Privacy Policy will be made available to you via our website. By using the App after such change, you accept the changes made to the new Privacy Policy. If you do not accept any of the changes made to the Privacy Policy, you may stop using the Application at any time.