

# PRIVACY POLICY

This Privacy Policy („Privacy Policy”) contains information about the processing of personal data collected in connection with the participation in the Innovation@Amazon Online Hackathon held on 27 - 29 November 2020. „(Hackathon’).

The entity acting as the Controller of personal data shall be PROIDEA Sp. z o.o. with its registered office at Zakopiańska St. 9, 30-418 Kraków, holding Tax Identification Number (NIP): 679-308-88-42, Industry Identification Number (REGON): 122769022, entered in the National Court Register under No. 0000448243, with the share capital of PLN 10,000 paid up in full, which may be contacted at the following e-mail address: [biuro@proidea.org.pl](mailto:biuro@proidea.org.pl)

## **For what purposes and which personal data do we process?**

1. The Controller processes your personal data in accordance with the Regulation 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 (“GDPR”).
2. In the case of Users, the Controller collects and processes the following personal data provided through the Hackathon registration form: name and surname, a nickname for the Discord application and e-mail address. Although providing those data is voluntary, it is required for the conclusion with the Controller and performance of an agreement on the participation in the Hackathon.
3. In the case of Participants signed up by a User, the Controller collects and processes the following personal data provided through the Hackathon registration form: name and surname, a nickname for the Discord application and e-mail address, links to professional social media profiles (LinkedIn, GitHub, GitLab, StackOverflow,, etc.), also a user name on social networking sites such as Facebook and Twitter.
4. In addition, photographs and video recordings may be made during the Hackathon, thus the Controller and the Organiser’s Partners will process your image pursuant to Art. 6.1.a of the GDPR.
5. Providing data such as links to professional social media profiles (LinkedIn, GitHub, GitLab, StackOverflow,, etc.), also a user name on social networking sites such as Facebook and Twitter is voluntary and optional.
6. User’s personal data referred to in Section 3 are processed for administrative purposes related to the participation in the Hackathon, as part of the Controller’s performance of the agreement on participation in the Hackathon, pursuant to Art. 6.1.b of the GDPR.
7. A Participant’s personal data referred to in Section 5 are processed for administrative purposes related to the participation in the Hackathon, based on Participants’ consent – Art. 6.1.a of the GDPR.
8. Subject to your consent, your personal data referred to in Section 5 may be processed for marketing and promotional purposes related to the offer of Partners and the Organiser, pursuant to Art. 6.1.a of the GDPR.
9. Following the performance of the agreement on the participation in Hackathon, the basis for data processing, to the extent specified in Section 10 below, will be the

legitimate interests pursued by the Controller (Art. 6.1.f of the GDPR), consisting in seeking to ensure the Controller's legal security.

10. Your personal data may be subject to profiling to achieve the purposes for which they have been collected. However, these data will not be used by the Controller for automated decision-making.

### **How long will we keep your personal data?**

1. Your personal data will be processed by us until expiry of the statute of limitations for any claims arising from the conclusion of a participation agreement with the Controller.
2. If you consent to the processing of your data for marketing purposes, the Controller and a Sponsor of the Hackathon (Amazon Development Center Poland Sp. z o.o.) will process them for this purpose until the consent is withdrawn.
3. If the Controller has obtained the consent to process your personal data with regard to the transfer to Hackathon Partners (basis for processing: Article 6.1.a. of the GDPR), your data will be processed for this purpose until it is transferred to the Hackathon Partners.

### **Who do we share your personal data with?**

1. The recipients of your personal data are employees and associates of the Controller and Organizer. Recipients of these data may also include entities that provide services to the Controller involving the organisation of the Hackathon.
2. The personal data collected by the Controller is accessible to, among others, the entity operating the Platform through which registration to Hackathon is made (the Platform is offered within the framework of the Evenea Internet service operated by EventLabs sp. z o.o. with its registered office in Warsaw).
3. If you consent to the processing of your personal data by Hackathon and Conference Partners, they will also be entitled to process your personal data as indicated above.
4. Sponsor (Amazon Development Center Poland Sp. z o.o.) will also be entitled to process your personal data for recruitment purposes. For more information on how the Sponsor uses personal information, see Sponsor's [Privacy Notice](#)
5. In some cases, your personal data may also be transferred to public authorities. This will only be the case if we are legally required to do so.

### **Purpose of personal data collection and scope of its processing**

All data collected by the Controller are used for the purposes for which they were collected, i.e. purposes related to the organisation of the Hackathon, including registration of Participants, ensuring communication with Participants and entities submitting notices of participation of Participants, as well as other purposes related to the performance of the agreement on participation in the Hackathon, and the complaint procedure. Subject to the consent of a relevant User or Participant who is not a User, the Controller may process the following data: name and surname, a nickname for the Discord application and e-mail address, links to professional social media profiles (LinkedIn, GitHub, GitLab, StackOverflow,, etc.), also a user name on social networking sites such as Facebook and

Twitter, for marketing purposes related to the presentation of the Organiser's and its partners' business activities and offer, and may transfer such data to Hackathon partners and sponsors, which will process them for marketing purposes related to the presentation of their business activities and offer. Giving the consent referred to in the sentence above is voluntary and is not a condition of participation in the Hackathon. The User, as the data subject, has the right to withdraw his or her consent to the processing of his or her personal data at any time. To that end, he or she should notify the Organiser of the fact by sending a relevant request by e-mail to the following address: [biuro@proidea.org.pl](mailto:biuro@proidea.org.pl), or to the correspondence address of the Website Operator. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Once the User withdraws his or her consent to the processing of personal data, the provisions of this Privacy Policy shall apply accordingly.

## **Your rights**

You have various rights in connection with the processing of your personal data.

Any requests related to the exercise of your rights may be submitted to us by e-mail ([joanna.dominik@proidea.org.pl](mailto:joanna.dominik@proidea.org.pl)) or regular mail (at the address: Zakopiańska 9 St., 30-418 Kraków). As we want to ensure that your data are protected properly, before acting upon your instructions, we may ask additional questions to confirm your identity.

You have the following rights:

1. Right to request access to data.
2. Right to rectification: if you believe that your personal data are inaccurate or incomplete, you may request relevant changes to be introduced to your personal data;
3. Right to erasure: you may request that your personal data be erased;
4. Right to restriction of processing: you may request that the processing of your personal data be restricted;
5. Right to object: you may object to the processing of your personal data on grounds relating to your particular situation. You have an absolute right to object to the processing of your personal data for direct marketing purposes, including profiling related to direct marketing;
6. Right to withdraw consent: if you gave your consent to the processing of your personal data, you can withdraw your consent at any time;
7. Right to data portability: if it is compatible with the law, you may request that the personal data you have provided to us be returned to you or transferred to a third party.

We use our best efforts to ensure that you benefit from the most comprehensive measures aimed at protecting your personal data in accordance with the applicable law. However, if you consider that we process your personal data unlawfully, you have the right to lodge a complaint with a supervisory authority, which in Poland is the President of the Office of the Personal Data Protection (Prezes Urzędu Ochrony Danych Osobowych).

## **General information on cookies**

The Website uses small files called cookies. Website Users are informed of the use of cookies through a relevant pop-up window displayed on the Website. In the notice the Controller informs Users that further use of the Website is deemed as the acceptance of the use of cookies, unless cookies have been disabled by the User in browser settings. Cookies are stored by the server on the computer of the User using the Website. Cookies usually contain the name of the domain from which they originate, their expiration date and a unique, randomly selected number identifying the file. Cookies do not contain data that would permit the identification of the User. Information collected by means of such files help adjust the Website to individual preferences and needs of Users. It also makes it possible to produce general statistics on the use of the Website. The operation of cookies is entirely safe for computers, in particular no viruses and other malicious software can affect Users' computers through cookies. Nonetheless, Users may restrict or disable the storage of cookies on their computers. If Users choose to do so, browsing through the Website will be possible, but the use of its certain functions may be limited.

## **Google Analytics**

The Website uses Google Analytics, a network analysis service offered by Google Inc. ("Google"). Google Analytics uses cookies that are stored on your computer allowing the use of the Website. Information on your use of the Website is normally transmitted to and stored by Google servers located in the United States. The Website uses IP anonymisation. This means that your IP address will be shortened in advance by Google in EU member states or other non-EU countries that are signatories of the Agreement on the European Economic Area. Only in exceptional cases will your full IP address, before being shortened, be transmitted to a Google server located in the United States. Google will use the provided information to analyse, for the benefit of the Controller, your use of the Website, create reports on activity on the Website and provide other services to the Controller related to the use of the Website and the Internet. The IP address identified by Google Analytics will not be combined with other data collected by Google.

## **Remarketing**

The Website uses remarketing cookies to provide advertisements to you on Facebook (Facebook Pixel) and Google (Google Display Network).

## **Web beacons**

In addition to cookies, the Website may also collect data customarily collected by webmasters in the form of logs or log files.

The information contained in logs may include your IP address, type of Internet platform and browser, your Internet service provider and the address of the website from which you entered the Website. Some pages of the Website may contain web beacons. Web beacons enable you to receive information such as the IP address of the computer used to load the

website, on which a given web beacon operates, the URL address of the website, time when the website was loaded, type of browser, as well as information stored in cookies, in order to evaluate the effectiveness of our advertisements.

### **IP address**

The Controller reserves the right to collect IP addresses of Website visitors, which may be helpful in diagnosing technical issues concerning the server and creating statistical analyses (e.g. to determine the regions where the highest number of Website visits are made). In addition, collection of IP addresses may be useful for administration purposes and to improve the Website. IP addresses are collected in an anonymous way, which means that they are not assigned to any User data.

### **Telecommunications confidentiality**

We ensure your protection as part of telecommunications confidentiality. Any information covered by telecommunications confidentiality may be disclosed only in the cases specified in special regulations. Information covered by telecommunications confidentiality may be processed for the purposes related to the operation of the website, if it is necessary for its proper functioning or supervision of its proper functioning.

### **Safeguards and personal data protection**

The Controller and the Operator process personal data in accordance with the Personal Data Protection Act of 10 May 2018 and implement technical and organisational measures which ensure adequate protection of processed personal data, considering relevant threats and the category of protected information, in particular they secure personal data against disclosure to unauthorised persons, loss or damage.

### **Amendments to the Privacy Policy**

The Controller reserves the right to amend this Privacy Policy. The Privacy Policy is an integral part of the Rules and any amendments thereof will take place in accordance with the procedure applicable to amending the Rules.

The date given below is the effective date of this Privacy Policy in its latest version.

Date: 6 October 2020.