

Partnerplace Privacy Policy

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Partnerplace is the name of the partnership management platform created by Rialto sp. z o.o., based at ul. Gdyńska 3 lok. 2, 71-534 Szczecin, NIP: PL8522701390. The names Partnerplace and Rialto sp. z o.o., should be treated as interchangeable.

We realize that you care about the security of processing and sharing your data. We also believe it's important for you to know how we treat this information, and we appreciate your trust that we do so carefully and reasonably.

I. Main concepts

Below you will find a list of terms that will help you better understand this Privacy Policy:

Account – an individual space made available to the Customer on the Partnerplace Platform (after logging in) in order to use the Service.

Administrator - Rialto sp. z o.o. - provider of Partnerplace software used for the exchange of Leads by the Customer and Partner

Partners – persons or companies whose data (in particular e-mail addresses) are processed as part of the Service or to whom Customers direct electronic communication (in particular e-mail communication).

Leads - people or companies whose data are provided by Partners or the Administrator as part of the Service.

Customer – a person or company using our Website to conduct business or professional activity, regardless of the legal form of this activity.

Information regarding activity within the Service - information regarding your activity within the Service, information regarding your session, your device and operating system, browser, location and unique identifier recorded and stored using cookies or tracking scripts. This information includes in particular: browsing history, clicks within the Service, visits to the home page and subsections, dates of creating the Account and logging in to the Account, information related to the use of individual services, history and activities related to our e-mail communication with you.

Information provided as part of the Account details - Personal Data provided by the User, consisting of name, surname, company or organization, address, e-mail address, telephone number, country, time zone, payment information, industry, number of employees and other data corporate.

Personal Data - data identifying a specific person, i.e. name and surname, e-mail address, telephone number, geographical address and/or company name, processed in connection with the use of the Service or Platform.

Privacy Policy - this Privacy Policy.

Processing – operations performed on Personal Data, such as collecting, recording, storing, adapting or modifying, disclosing, creating backup copies and other operations necessary to provide the Service.

Service - all services provided by Partnerplace electronically in the Software-as-a-Service (SaaS) model, including in particular ensuring that the Customer can use the Account, managing Information entrusted to Partnerplace for processing and conducting marketing campaigns.

User – a person using the Service.

II. Who are we? Our contact details.

Partnerplace as data controller/business and data processor/service provider

Partnerplace is committed to processing your personal information in compliance with all applicable privacy and data protection laws, regulations, frameworks and requirements (collectively, “Applicable Privacy Laws”), including the California Consumer Privacy Act of 2023 (“CCPA”) applicable to personal data.; 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 (“GDPR”), applicable for Covered Processing and other applicable privacy laws in the United States and other countries.

For the purposes of the CCPA, Partnerplace is a "business" (as defined in the CCPA) with respect to Customer and Partners' personal information; and with respect to Leads' personal information, we are a "service provider" (as defined in the CCPA). Therefore, in accordance with the GDPR, we are either a "data controller" (within the meaning of the GDPR) with respect to the Customer's Personal Data, or a "processor" (within the meaning of the GDPR) with respect to the Leads' Personal Data.

Unless otherwise specified, we process your personal data as a data controller/company in connection with your use of the Service. Therefore, we determine the purposes and methods of processing Personal Data.

When you use the Service, we receive and may collect two types of information: (1) Information regarding your Service activity and cookies, and (2) Personal Information that you knowingly choose to disclose.

If you click on a link on the Platform, it may take you to a third-party website and you will leave our site. We are not responsible for the privacy practices of third-party sites and encourage you to read their privacy statements. We are also not responsible for the content of third parties - it is the Customer and Partner who decide to add the above link in the platform.

To exercise your rights, express or withdraw consent and discuss all aspects of the security of your personal data, you can contact us at privacy@partnerplace.io.

If you would like to exercise the rights granted to you by the CCPA, please contact us at privacy@partnerplace.io.

III. How do we use Information? Your personal data and how they are processed.

The principles of our processing of your Information, the purposes and scope of processing vary depending on whether you are our Client, Partner, Lead or Platform User.

We only process Personal Data that is relevant for the purposes of processing. We do not process Personal Data in a manner that is incompatible with the purposes for which it was collected or for which you subsequently consented. Below we set out the purposes for which we process personal data, depending on the specific purposes for which we need it.

1. In order to provide the Service

When providing the Service, we perform a number of activities, which include: administrative activities related to the conclusion of a contract based on acceptance of the Regulations, creation of a Customer Account and authentication of the Customer within the Account, provision of materials requested by Customers or Users, activities related to the implementation of the Service, including sending communications related to the use or operation of the Service (in particular system and transaction mail), providing customer service, considering complaints and other requests, collecting fees due, pursuing claims and monitoring the quality of the Service.

What information do we use and for what purposes?

In order to create an Account and provide the Service, we process the following Information:

- Registration information (including email address) and password you have set.

We store your passwords in encrypted form.

In order to provide our Services (i.e. after logging into your Account as our Customer), we process the following Information:

- Information provided as Account data,
- Personal Data contained in the content sent via the Website (in particular data of Partners and Leads),
- Information regarding activity within the Platform or Service.

As a data processor/service provider, we also process Personal Data entrusted to us by the Customer in order to use the Service.

2. For legitimate interests

We process Personal Data for Partnerplace's legitimate interests described below, including relationships with our Customers, Partners, Leads or Users.

What information do we use and for what purposes?

a. For analytical purposes. In order to keep statistics on the use of the Service, which helps us improve and ensure network and information security, we process the following information:

- e-mail address,
- Information regarding activity within the Service

b. To pursue legal claims. Where necessary for the establishment, exercise or defence of legal claims, we process the following Information:

- Information provided as Account data,
- Information regarding activity within the Platform or Website necessary to establish a claim (including data of Partners and Leads),
- other data necessary to justify the claim, determine the scope of the damage and other circumstances of the damage.

c. To answer your questions. To respond to your inquiries, petitions and complaints, we may process the following Information:

- Information provided as Account data,
- Information regarding activity within the Platform or Service that is the subject of your inquiry, petition or complaint (including data of Partners and Leads),
- Information contained in the inquiry, petition or complaint and attached

documents.

d. Conducting customer satisfaction surveys. In order to check Customer satisfaction with the Platform or Service, we may process the following Information:

- Registration,
- Answers to the questions included in our survey.

e. To prevent fraud and abuse. To monitor, prevent, detect and combat fraud and abuse, including sending unsolicited content (SPAM), to protect our Customers from such abuse and to ensure network and information security.

f. In order to support Customer service, we may log in to your account (so-called "ghost mode") using our account. In this situation, we have access to all data contained in the account (analogous view to the main user on the client's side). This is used to support our customers when using the Partnerplace platform.

3. To send marketing communications

What information do we use and for what purposes?

In order to send our Customers and Users marketing and promotional messages regarding our Service or Platform, we may process the following Information:

- Registration (including email address)

4. To send technical communications

What information do we use and for what purposes?

In order to send our Customers, Partners and Users technical messages (e.g. information about a new function in the system / information affecting the security of their data) regarding our Service or Platform, we may process the following Information:

- Customer's e-mail address
- Partner's e-mail address

Any marketing communication to Partners requires Partnerplace to receive the Customer's prior consent.

5. To fulfil our legal obligations regarding accounting and taxes

We process your Personal Data in order to fulfil our legal obligations in the field of accounting and taxes, if you are our client or we have purchased any services from you. The legal basis for such processing is Art. 6 sec. 1 letter c GDPR.

V. To whom we disclose your personal data and their categories.

We use the services of external suppliers who provide us with services related to: supporting certain functionalities of the Service, hosting, customer service, tracking and responding to security incidents, diagnosing and solving problems with the Service, displaying web push notifications, analysing the effectiveness of our marketing campaigns, e.g. Google, and analysis of the use of the Service, payments and marketing activities.

We may also cooperate with service providers who do not act on our exclusive request and determine the method of processing Personal Data themselves in order to conduct remarketing and marketing campaigns and statistical analyses.

If you do not want us to share your personal information with these companies, please contact us as described in this Privacy Policy.

In some situations, we may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, if we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a government request. In such a case, you will be immediately informed by Partnerplace about the need to share your data.

In the event that Partnerplace is involved in a merger, acquisition, dissolution, sale of all or a portion of its assets, or other material corporate transaction, we reserve the right to sell or transfer your information as part of the transaction. In such event, you will be notified by email and/or a prominent notice on our website of any changes in ownership, incompatible new uses of your personal information and choices you may have with respect to your personal information.

Because our servers and operations may be located in the United States, the personal information and data you provide to us (about you, your contacts and others) may be transferred, collected, stored or processed in the United States. We may also transfer this information or data to our affiliates, contractors or others in the United States or elsewhere. In each case, we will do so only to the extent necessary to provide the Service to you, comply with our legal obligations, resolve disputes and enforce our agreements. We comply with applicable data protection regulations, and Partnerplace confirms compliance with the conditions set out in Chapter V of the GDPR.

In the last twelve (12) months, Partnerplace has disclosed the following categories of Customer Personal Data subject to the CCPA for business purposes (as defined in the CCPA): Identifiers, categories of Personal Data listed in the California Customer Records statute (California Civil Code § 1798.80 (e)), Commercial information, Internet or other similar network activity, Geolocation Data.

In most cases, we receive Personal Data directly from you when you contact us, create an Account, enter data into forms or conclude a contract with us. Sometimes we may rely on publicly available information from the Internet, such as online registries or social media platforms. If you are a contact person or representative of a business entity, we may receive your personal data from your employer or contractor that is that business entity.

VI. Sale and transfer of personal data

Partnerplace does not sell your personal data to any third parties.

VII. Your rights. You have control over your personal data.

We make sure that our Customers and Users can exercise their rights regarding their Information.

We very often act as a data processor/personal data service provider. This mainly concerns the processing of Personal Data of Leads and Partners on behalf of our Customers using our Service. In such cases, if you are the contact person and wish to exercise your data protection rights or have any questions about how we process your personal data by us as a data processor/service provider, you should contact your data controller/covered company CCPA, who is a Customer, who has decided to entrust us with his Personal Data. If you are unable to do this, you can also contact us at privacy@partnerplace.io. You should also read the separate privacy policy adopted by such Customer.

If you do not wish to receive communications from one of our Customers using our Service, please unsubscribe directly from that Customer's email communications or contact that Customer directly to change or delete your Personal Information. If you contact us directly, we may delete or update your Personal Data within a reasonable time and after informing you of your request.

We will respond to your request within 30 days. In some cases, we may not be able to fulfil your request - if this happens, we will always inform you and give you the reasons for our refusal.

Please be advised that any disclosures we make will only cover the 12-month period (CCPA) preceding the receipt of your verifiable request. For data portability requests, we will choose a format for transmitting personal data that should enable information to be transmitted from one entity to another without hindrance, in particular via e-mail.

If we deem it necessary, we may ask you additional questions or ask you to provide us with additional documents confirming your identity.

The exercise of the rights described below is free of charge, with the possible exception of providing additional copies of your Personal Data.

In some circumstances we will not be able to comply with your request, for example if it conflicts with our regulatory obligations, has a legal impact, we cannot verify your identity or it involves disproportionate cost or effort, but in any case we will respond to your request within a reasonable time and provide explanations. To make such a request, please contact us as described in this Privacy Policy.

You have the following rights:

1. Right to disclosure or access

You have the right to access the Personal Data we hold about you, and the right to request disclosure of the Personal Data we hold about you, receive further details about the Personal Data we collect about you and the purposes for which we use it, including any third parties with whom we share it.

If you have an Account on the Service, you can gain direct access to the Personal Data provided by you at any time after logging in to your Account.

2. Right to rectification

You have the opportunity to correct or amend your personal data if it is inaccurate or has been processed in violation of data protection laws. You can do this yourself in your Account or ask us to correct or change your Personal Data.

If you are a California resident and are affected by the CCPA, you may also contact us by email at privacy@partnerplace.io.

3. Right to erasure

You have the right to delete the personal data we have collected. We will also treat your request to delete all Personal Data as a request to delete your Account after you additionally confirm your intention to do so (if such an Account exists).

We will retain some of your Personal Data despite a request to delete it if it is necessary to comply with legal obligations, detect a security incident, assert rights, establish, pursue or defend legal claims or for any other reason specified by applicable law. This applies in particular to Personal Data regarding your name, surname, e-mail address and history of using the Service, on the basis of which we can consider complaints and claims related to the use of the Service.

4. The right to transfer personal data

In response to a disclosure request, we must provide Personal Information in an easy-to-use format to enable your Personal Information from us to be transferred seamlessly to another entity.

5. Non-discrimination

Under no circumstances will we discriminate against you for exercising any rights under the CCPA. Accordingly, unless permitted by the CCPA, we will not:

- Refuse to provide you with goods or services.
- Charge you different prices or rates for goods or services, for example by providing discounts or other benefits or imposing penalties.
- Provide a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted under the CCPA that may result in different prices, rates or quality levels. Any financial incentives we offer that are permitted under the CCPA will make reasonable reference to the value of your Personal Information and include written terms that describe the material aspects of the program. Participation in the financial incentive program requires prior consent, which you can revoke at any time.

VIII. Data storage time

If the Customer has an Account on the Service, we store your Personal Data for as long as you have an Account on our Website. When you deactivate your Account, we will retain your Personal Data for up to 30 days solely to enable you to reactivate your Account. During this time, we will store your data only without carrying out other processing activities, subject to our other obligations or rights arising from applicable legal provisions or orders of public authorities. After this time, we will delete your personal data from the main database, without the possibility of recovering it.

We will store Personal Data of Users who are not our Customers for a period corresponding to the life cycle of cookies saved on their devices or until deleted by the Customer or Partner. Detailed information on how we use cookies can be found in our Cookie Policy.

After the periods described above, your Data will be deleted, except for the following data:

- name,
- last name,
- e-mail address,
- Service use history,
- and information about consents expressed.

We will store this information only as long as necessary to resolve complaints and claims related to the use of the Service and, to the limited extent necessary, for as long as required by tax and accounting regulations.

1. Why am I concluding a data processing agreement with Partnerplace?

GDPR applies to the processing of your Personal Data because:

- you offer goods or services (paid or free) to data subjects in the EEA; Or
- you monitor the behaviour of such data subjects,
- you engage Partnerplace in the processing of Personal Data necessary to provide you with the Service on the terms set out in the Regulations or the Agreement.

2. Does Partnerplace process children's personal data?

We do not process children's personal data. The service is addressed to adults, i.e. people over 18 (eighteen) years of age and those conducting commercial activity. By starting to use the Service, you declare that you are over 18 years of age. We ask minors not to provide us with any information, in particular Personal Data. If we learn that we have collected or received Personal Data from a minor, we will delete that Personal Data. If you believe we may have information from or about a minor, please contact us at the email address provided here.

3. How does Partnerplace protect my personal data?

We take reasonable and appropriate measures to protect your personal information from misuse and unauthorized access, disclosure, alteration and destruction. The service uses encrypted data transmission (SSL, Secure Socket Layer) during registration and login, which guarantees the protection of Information identifying you and significantly hinders the interception of account data by unauthorized systems or persons. To build the platform, we use technology that meets the requirements of SOC 2 and GDPR. Files are hosted in the AWS infrastructure with over 143 security systems.

Despite this, no system can guarantee 100% security. If you have questions about the security of your Personal Information, or if you have reason to believe that the Personal Information we maintain about you is no longer secure, please contact us immediately as described in this Privacy Policy.

4. Does Partnerplace use cookies or similar tracking technologies?

We and our partners use cookies or similar technologies to analyse trends, administer the site, track Users' movements around the site, and gather demographic information about our User base as a whole. Details on the use of cookies can be found in our Cookie Policy.

5. Where does Partnerplace receive my personal data from?

We received your Personal Data:

- directly from you, from publicly available sources
- from your employer/contractor/entity you represent in connection with planning or establishing cooperation with Partnerplace
- from our client who placed them in the system as a Lead or other content.

From your employer/contractor/entity you represent, we receive data such as your name and surname, business telephone number or business e-mail address, place of work, position or information about the type of matters you deal with.

IX. Updating our Privacy Policy

We review this Privacy Policy regularly, but at least once every 12 months. We may change this Privacy Policy at any time. Unless otherwise stated, our current Privacy Policy applies to all Personal Information we have about you and your Account. If we make changes to this Privacy Policy, we will notify you by posting a notice here before the changes become effective. However, if we make material changes to this Privacy Policy, we may also send you a separate notice to the email address you have provided to us before the change becomes effective. We encourage you to review this Privacy Policy periodically to stay informed about our privacy practices.

The Privacy Policy does not limit any of your rights under the applicable Regulations or applicable law.