

## Privacy Policy of Nowy Adres sp. z o. o. websites

### 1. Definitions of terms used in the Privacy Policy

1. User - a natural person, legal person or organizational unit without legal personality using the services provided electronically via the websites indicated in point.2;
2. Personal data - any information relating to an identified or identifiable natural person.
3. Operator, User Personal Data Administrator - Nowy Adres sp. z o. o., with its registered office in Warsaw (00-833), at ul. Sienna 75, NIP 527-23-85-577, REGON 015242444, Company registered in the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register under KRS number 0000310941. Share capital PLN 100,000, fully paid up;
4. Websites - websites located in the following domains:
  - [www.nowyadres.pl](http://www.nowyadres.pl)
  - [www.mieszkaniowi.pl](http://www.mieszkaniowi.pl)
  - [www.biznesowi.pl](http://www.biznesowi.pl)
  - [www.matchmaker.nowyadres.pl](http://www.matchmaker.nowyadres.pl)
  - [www.nowestoisko.pl](http://www.nowestoisko.pl)
  - [warszawa.targimieszkan.pl](http://warszawa.targimieszkan.pl)
  - [poznan.targimieszkan.pl](http://poznan.targimieszkan.pl)
  - [wroclaw.targimieszkan.pl](http://wroclaw.targimieszkan.pl)
  - [krakow.targimieszkan.pl](http://krakow.targimieszkan.pl)
  - [Trójmiasto.targimieszkan.pl](http://Trójmiasto.targimieszkan.pl)each of which is hereinafter referred to separately as the "Website".

### 2. General information

1. The operator of websites:
  - a. [Www.nowyadres.pl](http://Www.nowyadres.pl),
  - b. [Www.mieszkaniowi.pl](http://Www.mieszkaniowi.pl),
  - c. [Www.biznesowi.pl](http://Www.biznesowi.pl),
  - d. [Matchmaker.nowyadres.pl](http://Matchmaker.nowyadres.pl),
  - e. [Www.nowestoisko.pl](http://Www.nowestoisko.pl).
  - f. [warszawa.targimieszkan.pl](http://warszawa.targimieszkan.pl)
  - g. [poznan.targimieszkan.pl](http://poznan.targimieszkan.pl)
  - h. [wroclaw.targimieszkan.pl](http://wroclaw.targimieszkan.pl)
  - i. [krakow.targimieszkan.pl](http://krakow.targimieszkan.pl)
  - j. [Trójmiasto.targimieszkan.pl](http://Trójmiasto.targimieszkan.pl)as well as the publisher of electronic and traditional magazines related to the Websites is Nowy Adres sp. z o. o., with headquarters in Warsaw (00-833), at ul.Sienna 75, NIP 527-23-85-577, REGON 015242444, The company is registered in the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register under KRS number 0000310941. Share capital PLN 100,000.
2. The Operator may obtain information about Users and their behavior in the following way:
  - a. Through information and data entered voluntarily in forms;

- b. through information and data entered voluntarily in the MatchMaker application available to Users;
  - c. by saving cookie files in end-devices (so-called "cookies");
  - d. by saving location information based on web browser data;
  - e. by collecting web server logs.
3. The Operator makes every effort to ensure the protection of their privacy to Website Users, and applies a policy of minimizing activities leading to the provision of data about Users or entrusting third parties with the processing of such data.

### 3. Service forms

1. The Operator, using the forms, collects and processes only information and personal data provided voluntarily by the User.
2. The website may also save information about connection parameters (time stamp, IP address).
3. The data saved via the form is protected by the Operator in accordance with the principles set out in this Privacy Policy.
4. The data provided in the form is processed for the purpose resulting from the function of a specific form, e.g. in order to process the service request or business contact.
5. The data provided in the forms may be transferred to entities that technically provide certain services - in particular, this applies to the transfer of information about the owner of a registered domain to entities that are operators of internet domains (primarily the Scientific and Academic Computer Network jbr - NASK), payment services or other entities, with whom the Website Operator cooperates in this regard. Detailed rules for sharing data with third parties are set out in point.10 of the Privacy Policy.
6. When the User completes the forms available on the Websites, the Operator provides a link secured with a security certificate in order to prevent the interception of data by unauthorized entities.
7. In the case of the provision of sales or booking services for tickets / invitations to trade fairs or industry conferences via the Websites, the Operator informs the User about the purpose and scope of processing of the personal data provided by him beyond the performance of the contract, i.e. provision of the booked or purchased service.

### 4. Server logs

1. Information about some of the Users' behaviors is logged in the server layer. These data are used to administer the website and to ensure the most efficient service provided.
2. The browsed resources are identified by URL addresses. In addition, the following may be recorded:
  - a.time of request,
  - b.time of sending the response,
  - c. Name of the client's station - in the case of identification by the HTTP protocol, d. Information about errors that occurred during the execution of the transaction - in the case of implementation by the HTTP protocol, URL address of the page previously visited by the User (referrer link) - if the Website was accessed via a link,
  - f. information about the User's browser,
  - g. Information about the IP address.
3. The above data may be associated with specific Website Users.

### 5. Newsletter and electronic contact with Users

1. Subscribing to electronic and free newsletters belonging to the Operator requires providing your name and e-mail address or other required data in the appropriate form. The operator clearly marks the fields that are required to complete the newsletter subscription. The data obtained in this way is added to the Operator's mailing list. The e-mail address is necessary to be able to send the requested content to the reader. First name allows you to refer to readers by first name. Other data (i.e. name, profession, company name, interests) allow the personalization of messages and the content of the newsletter.
2. Newsletters contain information about the Services, Magazines, Operator's services and products (e.g. promotions, new offers, partner campaigns), non-commercial letters (e.g. wishes, personal comments, etc.) and other commercial information regarding real estate (mailings of the Operator's partners' services, promotions, advertisements, other marketing materials).
3. The consent to receive newsletters is always voluntary. The operator never makes accepting an order for a service or registering the User on the Website conditional on consenting to receiving the newsletter.
4. Expressing consent to receive newsletters is tantamount to consenting to the following content:

*Acting as an end user within the meaning of Art.172 sec.1 of the Act of July 16, 2004 Telecommunications Law (i.e. Journal of Laws of 2018, item 1954 as amended), I consent to the Operator (Nowy Adres sp. z o. o. with its registered office in Warsaw) conducting direct marketing with the use of telecommunications end devices, by sending by e-mail to the e-mail address provided by me, marketing and commercial information, which at the same time constitute the ordered commercial information, referred to in art.10 of the Act of 18 July 2002 on the provision of electronic services (ie Journal of Laws of 2019, item 123).*

5. The user may at any time withdraw his consent to receive newsletters. Withdrawal of consent to receive newsletters does not limit or disable the Operator's other services, unless such an effect is clearly communicated to the User before accepting his declaration of resignation.
6. Withdrawal of consent to receive newsletters is made by selecting the appropriate box by the User in the content of the message confirming the ordering of the newsletter service, and then - in the content of each subsequent newsletter. Regardless of the method indicated in the preceding sentence, the User may at any time submit to the Operator a declaration of resignation from the newsletter service (as well as any other service available on the Websites). The declaration may be submitted at any company, however, the Operator recommends sending it in an e-mail to the Operator's address.
7. Regardless of the newsletter, the Operator reserves the right to send unannounced messages to Users whose contact details he has and who have accepted the Privacy Policy. Unannounced messages that do not constitute a newsletter refer directly to the Operator's services and the activities of its Websites and include technical information (including breaks and changes in the operation of the Websites, new functionalities) and legal and organizational information (including information on changes to the regulations or organizational transformations of the Operator).

## 6. User's telephone number and contact with Users using telephone communication devices

1. In the forms for ordering services on the Websites, the Operator clearly indicates whether the User's telephone number is necessary to order and perform the service.
2. Providing the User with his / her telephone number may be necessary, in particular, when telephone contact with the User is an important component of the service provided, e.g. it allows

to arrange conference participants or industry meetings for meetings, or to confirm such meetings.

3. Telephone numbers provided by Users are used for the purpose of providing the ordered services, including, in particular, information about the details, conditions and schedule of the service provided. In this case, the Operator makes both voice calls and sends SMS / MMS messages.
4. The User may allow the Operator to inform about new services, offers or industry events, in particular regarding the real estate market, by initiating phone calls or sending SMS / MMS messages to the telephone number provided. The operator reserves that such information or offers may constitute direct marketing of goods and services.
5. By agreeing to receive information and offers to the telephone number provided, you consent to the following content:

*Acting as an end user within the meaning of Art. 172 sec.1 of the Act of July 16, 2004 Telecommunications Law (i.e. Journal of Laws of 2018, item 1954 as amended), I consent to the Operator (Nowy Adres sp. z o. o. with its registered office in Warsaw) conducting direct marketing with the use of telecommunications end devices, by directing to the telephone number provided by me (in the form of voice calls and SMS / MMS messages) marketing and commercial information, which at the same time constitute the ordered commercial information referred to in art.10 of the Act of July 18, 2002 on the provision of electronic services (i.e. Journal of Laws of 2019, item 123)*

6. The User may, free of charge and at any time, withdraw his consent to the Operator using the given telephone number in full, or with the limitation of the scope of the withdrawal of consent, e.g. only for direct marketing. In the case of services for which ordering the provision of a telephone number, the Operator reserves that the complete withdrawal of consent to the use by the Operator of the telephone number provided may result in limiting or disabling the service.

## 7. Matchmaker application

1. The operator provides Website Users with the option of using the Matchmaker application, which is a tool for arranging meetings by conference participants.
2. The Matchmaker application is a separate service provided by the Operator, and its use requires separate registration.
3. By registering in the application, the User agrees to receive inquiries and invitations directly from other Users of the application. The Operator is entitled to make telephone contact with the User in order to perform the activities necessary to operate the application.
4. Through the application, the Operator collects and processes only data (including personal data) voluntarily provided by the User, within the limits of the consent given by the User. The operator informs that he is also entitled to process personal data in the form of a telephone number, also to carry out direct marketing of own goods and services by telephone.
5. The provisions of point 4 of the Privacy Policy.

## 8. Information and data disclosed by Users, not covered by the Operator's protection

1. All information about Users (including personal data) disclosed by the Users themselves on the websites belonging to the Operator when publishing comments to articles, answers on the forum, replies to e-mails and other forms of information exchange between Users are available to all visitors to pages containing such disclosed data. The operator is not able to secure the data thus disclosed against third parties, which information about Users may be used to send undefined information. For this reason, the Operator does not require Users to disclose their data (including personal data) when using the above-mentioned functionalities of the Websites.

## 9. Principles of recording and using the image of the Participant

1. The operator informs that it may - acting as an organizer or co-organizer - record the image of the Participant who purchases a ticket (or other document entitling to participate) through the Websites, and then takes part in fairs, conferences or other industry events. Preserving the image may also include other persons for whom the User has purchased a ticket (or other document entitling to participate) and minors subject to the User's custody during fairs, conferences or industry events.
2. In order to avoid any doubts, the Operator declares that in connection with the use of the Website, the User's image is not recorded and processed, as well as the consent to record and use the image is not necessary to use the Website. Possible processing of the image by the Operator (including its preservation) may take place in connection with participation in fairs, conferences or other events organized / co-organized by the Operator, on the terms expressly set out in the relevant regulations.
3. The Operator informs each time about the scope of consent to the recording and use of a fixed image in the regulations of fairs, conferences or other industry events.
4. The operator uses the recorded image directly or through authorized entities only within the limits of the consent granted and applicable law.
5. The person whose image has been recorded has the right to object to the use of the image each time. In this case, the Operator will take all necessary steps to end the use of the image, taking into account the technical specificity of the adopted method of use and in accordance with the principle of legal publication protection. Therefore, the operator will immediately remove the image from the Websites, but if the image is used in publications or materials published in print or in electronic form, the use will be discontinued in the next edition of the publication or materials.

## 10. Principles of processing and protection of data about Users

1. Data about Users, in particular personal data, are processed by the Operator only for the purpose for which they were collected, are subject to adequate protection and are made available to external entities only within legally permitted limits. In connection with the processing of personal data, the operator applies the principle of accountability and the minimization of processing activities, access to data, entrusting data for processing to third parties and making data available for processing to data recipients.
2. The Operator's partners who commission him to conduct mailings do not have access to the contact details of persons on the Operator's mailing lists. If the Operator creates and maintains User profiles, the profile data available to third parties is not associated with any markings that may identify the User, in accordance with the principle of anonymization of personal data.
3. The administrator of Users' personal data is the Operator.
4. The Operator processes Users' personal data in accordance with the provisions of the Act of May 10, 2018 on the protection of personal data (i.e. Journal of Laws of 2018, item 1000) using adequate technical and organizational measures. Personal data is properly secured against unauthorized access, damage or destruction.
5. Personal data of persons registering for the Fair or Conferences are processed by the Operator for the purpose of organizational support for the event, including accounting services, and for the purpose of keeping statistics and promotion of the event; are subject to adequate protection and are made available to external entities only within the limits permitted by law. These data are also processed in order to establish a list of guests and other external persons (if possible) present at the same time in a part / parts of the area where the event takes place, e.g. during the fair or

- event in which the Visitors and The Exhibitor participated / and possible communication by e-mail, text message or telephone to identify people who may have come into contact with infected COVID-19. The basis for the processing of personal data for these purposes is the protection of vital interests in the form of health and life in accordance with Art.6 sec.1. lit.d) GDPR.
6. The personal data of Visitors and Exhibitors are processed by the Operator to the extent necessary to fulfill the legal obligation imposed on the Organizer by a GIS recommendation regarding:
    - a). collecting statements that, to the best of the Visitor's knowledge, the Visitor is not an infected person and is not in quarantine or under epidemiological supervision;
    - b). in the case of fairs, registration of all fair participants in order to obtain data of persons present at the fairs (processing pursuant to art.8a section 5 point 2 of the Act of March 14, 1985 on the State Sanitary Inspection (Journal of Laws of 2019, item 59 and of 2020, item 322) in art. crisis situations of 2 March 2020 (Journal of Laws of 2020, item 374, as amended).
  7. In the content of the Privacy Policy, the Operator provides the User with all information required by law before collecting personal data from Users and / or consenting to their processing. User registration or ordering services on the Website is possible only after submitting a declaration of reading the Privacy Policy.
  8. In order to make it easier for the User to find and identify information required by law, the Operator provides the following information for persons from whom personal data concerning them are collected:

***Information of the personal data administrator provided when collecting personal data from the data subject in order to use the services provided through the Operator's Services***

*Pursuant to Art.13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC ("GDPR"), we inform about the rules for processing your personal data:*

**Who is the administrator of your data?**

- The administrator of Users' personal data is Nowy Adres sp. z o. o., address: ul.Sienna 75, 00-833 Warsaw. NIP: 527-23-85-577, REGON 015242444, the company registered in the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register under the number KRS 0000310941.
- The administrator has appointed a Data Protection Inspector who can be contacted in matters relating to related to the processing and protection of personal data at [iod@nowyadres.pl](mailto:iod@nowyadres.pl) or [kontakt@nowyadres.pl](mailto:kontakt@nowyadres.pl) or in writing to the address of the Administrator's seat.

**What data do we process?**

We process the personal data that you provided to the electronic account registration form on the Websites or the order form for another service provided via the Website.

These are:

- First name and last name; E-mail address; Current address of residence (including: country, city,



zip code, street and house / flat number; telephone number

If you consent to the processing of data for the purposes of marketing our services, we will process the data for this purpose:

- First name and last name; E-mail address; Phone number.

In addition, in connection with your use of the content provided on the Websites, we process data in the form of your IP number and server logs, described in detail in point.4 of the Privacy Policy

#### **Why and for what purpose do we process your data?**

We only process personal data provided by you in the manner indicated above, in order to:

- conclusion and performance of a contract for the performance of a designated electronic service on the terms set out in the Regulations of the Website (this may be participation in the Fair (booking of participation in the fair, purchase of a ticket) - legal basis for processing - Article 6 (1) (b) of the GDPR and Article 6 paragraph 1 (a) of the GDPR);
- answering questions directed to us by both our clients and other interested services, as well as performing our obligations related to complaints regarding the performance of services (Article 6 (1) (b) of the GDPR);
- for purposes resulting from legal provisions (Article 6 (1) (c) of the GDPR), as well as for archiving and reporting purposes, as well as for establishing, investigating and defending against claims, ensuring the safety of persons and property (Article 6 (1) letter f of the GDPR);
- in order to offer you directly (direct marketing) our services, e.g. in the form of information about new services and promotional offers (Article 6 (1) (f) of the GDPR and Article 6 (1) (a) of the GDPR);

#### **Who do we obtain your personal data from and to whom can we pass them on?**

We do not obtain your personal data from external sources (from entities other than the data subject) and we only process the data that you provide yourself and voluntarily.

Your data may also be accessed by our subcontractors (entities processing data on our behalf), e.g. IT companies and payment operators who cooperate with us in the implementation of your online payments, in connection with the purposes and activities of processing indicated above. or payment by credit cards.

Your personal data within the scope of the marketing consent may be made available for processing to external entities providing marketing services to us, in particular mailing services. In terms of entrusting processing for marketing purposes.

In accordance with applicable regulations, we may also transfer your personal data to authorities authorized to obtain such data on the basis of applicable law, e.g. courts, bailiffs or law

enforcement authorities - of course only if they make a request based on a binding legal basis.

We assure you that all persons who will have access to your data will have a written, personal authorization to process it and will be obliged to keep your data confidential. Both the Administrator and entities processing data on his behalf implement appropriate technical and organizational measures so that the processing of personal data takes place in accordance with the GDPR and other applicable regulations.

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

Your personal data will be processed by us for the entire period of providing services to you (it may be both browsing the Website pages, using the newsletter service and other services available on the Websites), and then for the period in which claims related to with these services, i.e. for 6 years + 1 year from the end of the year, counting from the day we finished providing services for you. We have adopted such a data retention period, because 6 years is the longest possible period of limitation of claims, an additional year is in the case of last-minute claims and problems with delivery, and counting from the end of the year is used to determine one date for deletion of data regarding cooperation completed within of the year.

Paper documents containing your personal data are stored by the Administrator until the end of the year following the year of their production, and then are destroyed after prior archiving to electronic form, unless specific provisions require the Administrator to store them in paper form for a longer period. Electronic copies of these documents are stored in an encrypted form until the expiry of the period indicated in the paragraph above.

During the period of data storage, after the completion of the ordered service, the data will be encrypted and access to them will be limited only to persons who will be responsible for handling your complaints and claims and for cooperation with authorized bodies.

The data processed for the purposes of direct marketing of our services to the extent for which we have obtained your consent will be processed until you object to their processing for this purpose or we determine that they have become obsolete.

#### **Are you obliged to provide your personal data and consent to their processing?**

Providing personal data in the form available on the Website is always voluntary, however, it is a condition for the conclusion and performance of the ordered service (contract) by the Administrator.

Granting consent to the processing of your personal data for marketing purposes is voluntary. Lack of consent does not affect the performance of other activities by the Administrator.

#### **Can you object to the processing of your data or withdraw your consent to their processing?**

You have the right to object to the processing of your data for marketing purposes at any time.



For this purpose, please send a statement of objection to the e-mail address: [iod@nowyadres.pl](mailto:iod@nowyadres.pl) or in writing to the address indicated above. If you exercise this right - we will stop processing your data for marketing purposes immediately.

You also have the right to delete the data you provided in the Website form at any time. The operator will cease to process the data, which, however, may result in the suspension of the service or the lack of access to any data collected in the user's account. After completing your request to delete data, the Operator will still be obliged to process and store your data for the other purposes indicated, always where there are legal grounds obliging us to further processing or the data will be necessary for the Operator to determine, pursue or defend claims.

#### **What are your other rights regarding your personal data?**

According to the GDPR, you are entitled to:

- the right to access your data and receive a copy of it;
- the right to rectify (correct) your data;
- the right to delete data, limit data processing;
- the right to object to data processing;
- the right to data portability;
- the right to lodge a complaint with a supervisory authority.

#### **Does the Personal Data Administrator use automated decision-making and profiling based on your personal data?**

Please be advised that the Operator performs profiling of the data provided in the forms, but only for the purpose of sending messages that meet the expectations of the Participants.

9. The Operator provides each User with direct and constant access to current information on the methods, purposes and conditions of processing his personal data, in particular, he informs the User about any changes in this regard. Access to information is carried out by providing the current wording of the Privacy Policy and Cookies Policy on the Website pages. In addition, the User may at any time obtain information and answers to questions via e-mail, and submit all statements and requests regarding the processing of his personal data in this way.

## **11. Cookies policy**

1. The Operator's websites use cookies.
2. Cookie files (so-called "cookies") are IT data, in particular text files, which are stored on the Website User's end device and are intended for use with the Website's websites. Cookies usually contain the name of the website they come from, the storage time on the end device and a unique number.
3. The entity that places cookies on the Website User's end device and obtains access to them is the Website Operator.
4. Cookies are used for the following purposes:
  - a). creating statistics that help to understand how Website Users use websites, which allows improving their structure and content;

- b). maintaining the Website User's session (after logging in), thanks to which the User does not have to re-enter the login and password on each subpage of the Website;
- c). determining the User's profile in order to display him matched materials in advertising networks, in particular the Google network.
5. The Websites use two basic types of cookies: session cookies and persistent cookies. Session cookies are temporary files that are stored on the User's end device until logging out, leaving the website or turning off the software (web browser). Persistent cookies are stored on the User's end device for the time specified in the cookie file parameters or until they are deleted by the User.
6. Software for browsing websites (web browser) usually allows cookies to be stored on the User's end device by default. Website Users can change the settings in this regard. The web browser allows you to delete cookies. It is also possible to automatically block cookies. Detailed information on this subject can be found in the help or documentation of the web browser.
7. The user should be aware that limiting or disabling the use of cookies may affect some of the functionalities available on the websites of the Services.
8. Cookies placed on the Website User's end device may also be used by advertisers and partners cooperating with the Website operator.
9. We recommend that you read the privacy protection policies of these companies to learn about the rules of using cookies in the statistics: Google Analytics Privacy Policy.
10. Cookies may be used by advertising networks, in particular the Google network, to display advertisements tailored to the manner in which the User uses the Websites. For this purpose, they may keep information about the User's navigation path or the time spent on a given page.
11. In terms of information about the User's preferences collected by the Google advertising network, the User may view and edit information resulting from cookies using the tool:  
<https://www.google.com/ads/preferences/>
12. If the User does not want to receive cookies, he may change the browser settings. We reserve that disabling cookies necessary for authentication processes, security, maintaining User preferences may make it difficult, and in extreme cases may prevent the use of websites.
13. In order to manage cookie settings, select the web browser / system from the list below and follow the instructions:
- Internet Explorer
  - Chrome
  - Safari
  - Firefox
  - Opera
  - Android
  - Safari (iOS)
  - Windows Phone
  - Blackberry

## 12. Final provisions

1. The Privacy Policy together with the Cookies Policy is effective from January 1, 2019.
2. The Operator reserves the right to change the Privacy Policy and Cookies Policy at any time. The uniform text of the privacy policy and cookie policy after the changes will be available on the main pages of the Websites in the "Privacy Policy" tab. The Operator will inform the Users about the planned change one week in advance, indicating the scope of the changes and the effective date. If the User does not accept the changes, the contract for the provision of electronic services will be terminated upon the expiry of the deadline indicated in the notification. Each change of the

Privacy Policy and Cookies will be visible in the "Privacy Policy" tab on the main pages of the Websites.