

PRIVACY POLICY AND COOKIES

Who is the Administrator of my personal data?

The Administrator of your personal data is DESIGN THINKING INSTITUTE Iwona Gasińska-Mulczyńska at Juliusza Słowackiego 17/9, 60-822 Poznań, Poland, NIP (Tax ID): 5252031818 / REGON (Business Registry): 634468755 (hereinafter: Administrator).

Contact details of the Personal Data Administrator:
DESIGN THINKING INSTITUTE Iwona Gasińska-Mulczyńska
Address: Juliusza Słowackiego 17/9, 60-822 Poznań
Phone: 501 109 691
E-mail: ig@dt-institute.pl

The Administrator is responsible for the use of personal data in a safe manner and in accordance with the applicable laws.

Who can I contact in matters related to the processing of my personal data?

You may contact us in all matters related to the processing of your personal data by the Administrator:

e-mail: ig@dt-institute.pl

phone: 501 109 691

or in person at the head office of DESIGN THINKING INSTITUTE at Juliusza Słowackiego 17/9, 60-822 Poznań. The Administrator has not appointed a Data Protection Inspector or its representative.

What is the source of my data - how is my data obtained?

We collect personal data directly from you. If you are a representative (e.g. employee) of our Client, we may also collect your data directly from this Client or from publicly available online resources (e.g. public databases such as the Polish CEIDG or KRS, or corporate websites).

We collect your data for various purposes, and we process them in different scopes, on different legal grounds, as provided for in the GDPR. In order to provide you with as transparent information as possible, we have grouped the information below with reference to the purpose of processing your personal data.

What is the scope and purpose of personal data processing by the Administrator?

Participation in Design Thinking Moderator Courses



Description. In connection with the organisation of Design Thinking Moderator Courses, we process personal data of our Clients - natural persons (consumers) or personal data of representatives of business partners - entrepreneurs.

Scope of data. For this purpose, we process your name, surname, place of employment, telephone number, e-mail address, and business correspondence address. If you are a natural person participating in our workshops individually, we process your name, surname, e-mail address, telephone number, bank account number, and data necessary to issue a VAT invoice.

Legal basis. Necessity to process personal data for the purpose of contract conclusion and performance (Article 6.1.b of GDPR).

Newsletter

Description. DESIGN THINKING INSTITUTE regularly sends its Clients a newsletter on subjects relating to design thinking. Its distribution is via email.

Scope of data. For this purpose, we process your e-mail address.

Legal basis. Your consent to receive the newsletter with information related to the design thinking concept (Article 6.1.a of GDPR).

Statistics on the use of selected functionalities of a website (www.designthinkingkurs.pl) as well as facilitating the use of the website, and ensuring its IT security.

Scope of data. For these purposes, we process personal data concerning your activity on the website, such as: visited pages and sub-pages, the amount of time spent on each of them, as well as data concerning your search history, your IP address, location, device ID, and data concerning your browser and operating system.

Legal basis. Our legitimate interest (Article 6.1.f of GDPR) in facilitating the use of electronically supplied services and improving the functionality of these services.

Establishment, assertion and enforcement of claims

Scope of data. For this purpose, we may process some of the personal data you provide: name, surname, address and data relating to the use of our services, if the claims arise from the manner in which you use our services, other data necessary to prove the existence of the claim, including the extent of the damage suffered.

Legal basis. Our legitimate interest (Article 6.1.f of GDPR) in establishing, asserting and enforcing claims, and defending ourselves against claims in proceedings before courts and other state bodies.

Handling complaints and requests, answering questions

Scope of data. For this purpose, we may process some of the personal data you have provided in connection with the use of our services, as well as data relating to the use of such services, constituting the cause of the complaint or request, as well as data contained in documents accompanying such complaint or request.

Legal basis. Our legitimate interest (Article 6.1.f of GDPR) in improving the functionality of the services provided by the Administrator, and building positive relations with DESIGN THINKING INSTITUTE, based on reliability and loyalty.



Personal data of entrepreneurs' representatives

The legal basis justifying the collection of personal data of entrepreneurs' representatives from publicly available resources is our legitimate interest (Article 6.1.f of GDPR) in the acquisition of Clients in order to provide them with services related to the idea of design thinking, as well as building positive relations between the Administrator and prospective Clients. In the case when our Client is an entrepreneur, we process their data necessary to issue an invoice, i.e. name (company), business address (registered office address) and NIP/Tax ID number.

Who is my personal data transferred to?

Personal Data Administrator takes the utmost care to ensure the confidentiality of your personal data. Given the need to fulfil contractual obligations and ensure proper performance of services for our Clients, personal data are transferred to the entities listed below.

Subcontractors providing services to us for the purpose of proper service performance for Clients

We transfer your personal data to our subcontractors who support us in the proper performance of our services and the sale of goods to our Clients. We transfer personal data to entities such as: banks and payment operators, couriers (in connection with the fulfilment of an order), marketing agencies, companies preparing graphics, printing houses.

Service providers

We also transfer your personal data to providers of services that we use in the course of our business. Such providers provide the Administrator with technical and organizational solutions enabling the provision of services to our Clients along with organizational management. For example, we transfer data to entities providing accounting, bookkeeping, legal, advisory, auditing and consulting services for the purpose of our operations. We also transfer data to entities providing IT services and maintenance of IT systems for the Administrator, e.g. to software providers, including providers of servers on which personal data is stored.

State authorities

We transfer your personal data if requested to do so by authorized state institutions, in particular the organizational units of the prosecutor's office, the Police, President of the Personal Data Protection Office, President of the Office of Competition and Consumer Protection, or President of the Office of Electronic Communications.

Is my data transferred outside the European Union?

In order to make our services as effective as possible, some of the service providers we use are based in countries outside the European Economic Area. Please be informed that your data may be transferred outside the European Economic Area. In each such case, we ensure



the security of your personal data by concluding Standard Contractual Clauses approved by the European Commission with service providers.

For how long is my personal data processed?

Depending on the purpose for which we process your personal data, we only store it for as long as is necessary for processing purposes.

In any such case, the duration of data processing by the Administrator depends on the type of service provided and the purpose of processing:

- 1) as regards data processed on the basis of your consent - we process it until the withdrawal of consent. Remember that you can withdraw your consent without any consequences, at any time,
- 2) in any case, we process your personal data until objection to the processing of such personal data is effectively made,
- 3) as a rule, we process the data throughout the duration of service provision or order fulfilment, i.e. for the time necessary in connection with the contract,
- 4) we may process personal data for a longer period of time, but up to the date of expiry of contractual claims, when the legal basis for data processing is the Administrator's legitimate interest. After such time, personal data will be processed only if and to the extent required by law. After the end of the processing period, the data is irretrievably deleted or anonymised.

Am I obliged to provide data?

Provision of certain data is a condition of using particular services or goods offered by the Administrator (obligatory data). Our system automatically marks obligatory data. If such data is not provided, we are unable to provide certain services to you or to sell goods. Apart from the data marked as obligatory, the provision of other personal data is voluntary. Your personal data will not be processed for automated decision-making, including profiling.

Legal basis. Necessity for the purpose of service provision (Article 6.1.b of GDPR).

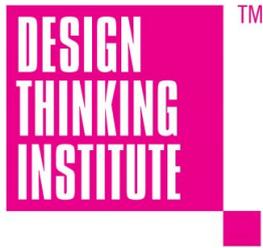
What rights do I have?

In connection with the processing of your personal data, the Administrator ensures the execution of your rights related to personal data processing, as described below. You can exercise your rights by submitting a request to the e-mail address ig@dt-institute.pl

The right to withdraw consent

You have the right to withdraw your consent to the processing of personal data. Such withdrawal of consent takes effect from the moment of withdrawal of consent. The withdrawal of consent does not affect our lawful processing before the withdrawal. The withdrawal of consent does not entail any negative consequences for you. However, it may preclude the use of some of our services.

Legal basis: Article 7. 3 GDPR



Right to object to the use of data

You have the right to object - at any time - to the use of your personal data if we process your data on the basis of our legitimate interest, e.g. in connection with the processing of complaints, requests and replies. If your objection is justified and we have no other legal basis for processing your personal data, we will delete the data you have objected to.

Legal basis: Article 21 GDPR

Right to erasure ("right to be forgotten")

You have the right to request the deletion of all or some of your personal data. We will treat the request to delete all personal data as a request to delete your Account.

You have the right to request the deletion of your personal data if:

- a) you have withdrawn your specific consent to the extent that the personal data was processed on the basis of your consent,
- (b) your personal data is no longer necessary for the purposes for which it was collected or for which it was processed,
- c) you have objected to the use of your data for the purpose of statistics on the use of the Service / Website and satisfaction surveys, and the objection has been found to be justified,
- d) your personal data has been processed unlawfully.

Despite the request to erase personal data, we may retain certain personal data to the extent necessary for the purposes of establishing, asserting or defending claims. This applies in particular to personal data such as: name, surname and address, which we retain for the purpose of handling complaints and claims related to the use of our services.

Legal basis: Article 17 GDPR

Right to restriction of data processing

You have the right to request that the processing of your personal data be restricted. If you make such a request, we will prevent you from using certain functionalities or services, the use of which will be associated with the processing of the data covered by the request, until the request is examined.

You have the right to request a restriction on the use of your personal data in the following cases:

- a) when you question the correctness of your personal data - in such case we will limit its use for the time necessary for us to verify the correctness of your data, but not longer than for 7 days,
- b) when the processing of your data is unlawful and instead of erasing such data, you request a restriction of its use,
- c) when your personal data is no longer necessary for the purposes for which we collected or used it, but you need it in order to establish, assert or defend your claims,
- d) when you have objected to the use of your data - the restriction shall be for the time necessary to consider whether, due to your specific situation, the protection of your interests, rights and freedoms outweighs the interests that we pursue when processing your personal data.

Legal basis: Article 18 GDPR



Right of access to data

You have the right to obtain confirmation from us as to whether we process your personal data, and if so, you have the right to:

- a) have access to your personal data,
- b) obtain information on the purposes of such processing, the categories of personal data subject to processing, the recipients or categories of recipients of the data, the planned period of storage of your data or the criteria for determining this period, your rights under the GDPR and the right to submit a complaint with the supervisory authority, the source of such data, automated decision-making, including profiling, and the safeguards applicable to the transfer of the data outside the European Union,
- c) obtain a copy of your personal data.

Legal basis: Article 15 GDPR

Right of rectification

You have the right to request that your personal data be corrected (if it is incorrect) or that the personal data provided by you be supplemented (if it is incomplete).

Legal basis: Article 16 GDPR

Right to data portability

You have the right to receive your personal data that you have provided to us, and then send it to another personal data administrator of your choice, e.g. to another operator of similar services. You also have the right to demand that personal data be sent by us directly to such other administrator, if technically possible.

Legal basis: Article 20 GDPR

How long does it take for us to fulfil your request?

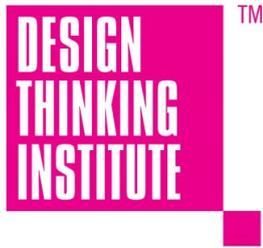
If, in the exercise of the above-mentioned rights, you submit a request to us, we either fulfil the request or refuse to fulfil it immediately, but no later than one month after its receipt. If, however, due to the complexity of the request or the number of requests, we are unable to fulfil your request within one month, we will do so within the next two months, notifying you in advance of the envisaged deadline extension.

Can I complain about the processing of personal data?

You have the right to file a complaint to the supervisory authority against the processing of personal data by the Personal Data Administrator. Such complaint may be submitted to the President of the Personal Data Protection Office (address: Stawki 2, 00-193 Warsaw).

Cookie policy

By using the website provided in the domain www.designthinkingkurs.pl, consent is given to the installation of cookies on the end device of the person using the Website and the use of cookies by DESIGN THINKING INSTITUTE Iwona Gasińska-Mulczyńska, in accordance



with this Policy. Consent is given through the settings of your web browser. If the User does not agree to the use of cookies, he/she should change the settings of his/her browser in an appropriate way, or resign from using the Website (more information below).

1. What is a cookie file?

"Cookies" are small text files that are sent by the websites you visit and downloaded on your computer. The information contained in these cookies allows the data contained in them to be read only by the website that created them. Thus, the website cannot have access to other files on the user's computer.

2. Why does the website www.designthinkingkurs.pl use cookies?

Cookies used on the www.designthinkingkurs.pl website enable measuring user activity on the website. We use cookies in order to adjust and improve the way the website works. Cookies also enable the analysis of user preferences and thus help constantly improve the quality of our services. We do not use cookies to contact the user via phone, e-mail or traditional mail. We do not use behavioural cookies on our websites.

3. What cookies do we use?

Two types of cookies can be used on the www.designthinkingkurs.pl website:

- a) session cookies - these remain on the user's device until he/she leaves the website or closes the web browser,
- b) persistent cookies - they remain on the user's device for the time specified in file parameters or until manually deleted by the user.

4. Can I refuse to accept cookies?

Activities related to storing and sending cookies are handled by web browsers and are invisible to the user. Most browsers accept them by default. However, the User may configure the browser to reject requests to store cookies - in general or for selected sites. This can be done using the settings in each browser. However, before making such a decision, it is worth remembering that many cookies help use the website.

5. How to disable cookies?

Detailed information about the use of cookies is available in the settings and documentation of the selected web browser.