

Privacy Policy

I) General Information

- 1) The Privacy Policy of the website www.implicit-code.com (hereinafter referred to as "**Website**") is addressed to the users of the Website (hereinafter referred to as "**User**") and determines the type, scope, and ways of use of the personal data as well as the rights and obligations of the User and the means of protection of personal data.
- 2) The administrator of the personal data in accordance with the Act of August 29, 1997 on the Personal Data Protection (Dz. U. of 2002., Nr 101, poz. 926, as amended, hereinafter referred to as the "**Act on the Protection of Personal Data**") is Neurohm sp. z o.o. sp.k., with its registered office in Warsaw (00-586), Poland, at 9/2 Flory St., entered in the National Court Register under entry no. 0000449548 (hereinafter referred to as "**Service Provider**").

II) The collected data

1) Data collected automatically

- a) During the use the Website by the User the following personal data of the User is automatically collected: e-mail address and the operating system type. These data can be collected by the so called cookies files, Google Analytics and www.implicit-code.com
- b) Cookies, referred to in the point 1 above, are the files sent to a computer or other device of the User while browsing the Website. Cookies remember user preferences, enabling to improve the search results and relevancy of the displayed

information as well as tracking user preferences. User may refuse the use of cookies by selecting the relevant settings directly in his browser.

- c) Consent to store or to access the cookies available on your device by the Service Provider is granted using the settings of the browser installed on your device. If you want to delete existing cookies from your device, you can do it using the options of your browser.
- d) The Service Provider uses the following types of cookies (unless otherwise specified):
 - (i) **necessary cookies** - files which are essential to enable Users to navigate the Website and use its features, such as access to safe areas on the site. Without these cookies some services used the User cannot be provided;
 - (ii) **performance cookies** – files collecting information about how Users use the Website, which parts of the Website are visited most often, and whether the Users receive error messages from the Webpage. The data collected by these cookies is anonymous and used only to improve the functioning of the site;
 - (iii) **functional cookies** – recording the choices made by Users (such as user's gender, age, language or region where the users reside). These files can also be used to store changes made by the User, e.g. the change of the size and font of the text and other parts of the Website that can be edited. The information collected by these cookies may be used by the Service Provider to identify the User's behavior.

- e) Google Analytics, referred to in point. 1, is a web analytics system that gives an insight into the traffic of the Website used to carry out marketing activities.
- f) Social media of the third parties may register the information about you, e.g., when you click on the button "Add" or "Like" in relation to the social network site while visiting our Website. We do not control such websites or their actions. We recommend getting acknowledged with the information on such social media sites which can be found on their websites, as well as with the Terms and Conditions and Privacy Policy of such sites prior to using them.

III) Use of data

- 1) Data given by the User or the data collected automatically are used by the Service Provider in order to:
- 2) ensure the proper functioning, configuration, security and reliability of the Website;
 - a) monitoring of the status of the session;
 - b) adjust the display of the information to the user;
 - c) analyses, statistics, research and audit the views of the Website.
- 3) The Service Provider provides the user data to the Inspector General for Personal Data Protection ("Inspector General") as well as law enforcement and judicial authorities or to the other entities entitled to receive them under the law, if there are justifiable legal ground for such action.

IV) The right of access to the personal data

- 1) The User has right of access to their personal data and to correct them.
- 2) Providing personal data is voluntary, but it can prevent the proper operation of the Website.
- 3) Any changes concerning his personal data may be made by the User once he is registered and/or logged on the Website or via the link sent by the Service Provider to the User via e-mail.

V) Protection of personal data

- 1) The Service Provider as an administrator of personal data applies technical and organizational measures necessary to protect the data required by the Act on the Protection of Personal Data, in particular, he protects the personal data of the users from making them available to the unauthorized persons, as well as from loss or damage.
- 2) Communication between the User and the server of the Website is encrypted. Security of the data transmission is ensured through the use of transmission protocol SSL (Secure Socket Layer). SSL consists in coding data before it is sent from the User's browser and decoding if after the safe arrival on the server hosting the Website. The information which is sent from the server of the Website to the user is encoded and decoded.

VI) Exclusion of liability

The Service Provider shall not be liable for the acts or omissions of users, as a result of which the Service Provider processes the personal data given by them in a manner described in this Privacy Policy.

VII) Contact

- 1) Any additional questions and information related to the present Privacy Policy may be directed to the Service Provider at the following email address: icode@neurohm.com

VIII) Final provisions

- 1) The present Privacy Policy shall enter into force on 31 March 2016.
- 2) The rules described in this Privacy Policy shall be subject to the law of the Republic of Poland.
- 3) The Service Provider is entitled to unilaterally amend the Privacy Policy in the event of: (a) the circumstances of force majeure, (b) changes in the regulations in force applicable to the provision of electronic services or to the transactions concluded at distance, (c) changes in the offer of the Service Provider presented on the Website. The Service Provider will notify the User of any change of the Privacy Policy, in the form of a message sent to the email address provided by the User to the Service Provider. The Users will be bound by the provisions of the new Privacy Policy, unless they terminate it within thirty (30) days from the date of notification about changes in the Privacy Policy.