

PRIVACY POLICY

We, VENDO CONNECT INC, value your privacy, therefore we want to provide you with the most precise information regarding the rules of processing your personal data by us.

This privacy policy is addressed to people visiting our website or profiles on social media or other websites, as well as people who contact us via the above-mentioned channels for various purposes: starting cooperation, submitting a complaint, or obtaining an answer to another question, etc. However, we do not aim any of our products or services at consumers and children, and we do not knowingly collect personal information about consumers or children.

If you are from the European Economic Area, the GDPR provisions apply. When we write 'GDPR', we mean 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 (General Data Protection Regulation).

If you are from the Great Britain, the GDPR UK provisions apply to you. When we write 'GDPR UK', we mean the Data Protection Act 2018.

If you are a California resident, the CCPA provisions may apply. When we write "CCPA", we mean the California Consumer Protection Act.

Due to different legal definitions, we use the term personal data and personal information interchangeably.

By using our website or services, you also declare that you are aware of our practices regarding the collection and use of your personal information.

1. More about us and how you can contact with us

Your personal data will be processed by VENDO CONNECT INC Delaware corporation, with correspondence address: 3500 S DuPont Highway, Dover, County of Kent, Delaware 19901, US, entered into register under file No. 7005612 (hereinafter: 'Vendo').

In addition to using the contact form on our website, you can also contact us via e-mail at the following address: gdpr@getvendo.com

Within the meaning of the GDPR and the GDPR UK, Vendo is the controller of your personal data. At the same time, we would like to inform you that Vendo has not appointed a data protection officer.

2. Why do we collect and what will we use your data for

Vendo will collect and process your data:

- a) **In order to maintain the <https://www.getvendo.com/> website and subdomains, as well as to make available the content and functionalities collected on it** (such as contact forms, newsletter) and thus **provide electronic services**

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(b) of the GDPR or the GDPR UK.]

- b) **in order to enable you to contact us** (including via the contact form on our website), **answer the question and conduct further correspondence** - both by e-mail and via other channels, such as social media, if you choose this form of communication

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(f) of the GDPR or the GDPR UK, i.e. the legitimate interest of Vendo, consisting in conducting correspondence addressed to Vendo in connection with the conducted activity, as well as pursuant to article 6(1)(a) of the GDPR or the GDPR UK, in terms of additional data not required by Vendo and provided by you voluntarily.]

- c) **in order to provide you with certain services and thus the possible conclusion or performance of an agreement with Vendo** – both when an agreement is concluded or is to be concluded with you or you act as an employee, associate, representative, member of the management board, etc.) on behalf of the entity that is/will be a party to such an agreement

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(b) of the GDPR or the GDPR UK (in the case of a client/contractor who is a natural person, including natural person conducting individual business activity or in the case of a partner in a civil partnership) or article 6(1)(f) of the GDPR, i.e. the legitimate interest of Vendo, which is the necessity of processing in the form of taking action in order to conclude or perform an agreement with a customer/contractor (in the case of persons acting on behalf of a customer/contractor who is both a natural person and a legal person or other organizational unit, i.e. employees, associates, representatives of such a client/contractor, members of the client's/contractor's management board, etc.)]

- d) **for the purpose of sending the newsletter**, if you wish to receive it

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(b) of the GDPR or the GDPR UK.]

- e) **for purposes deriving from the provisions of law, if Vendo has obligations relating to the necessity to process data**

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(c) of the GDPR or the GDPR UK.]

- f) **in order to consider any complaints, as well as to establishment, exercise or defence of legal claims.**

[If the GDPR or the GDPR UK applies: the basis is article (6)(1)(f) of the GDPR or the GDPR UK, i.e. the legitimate interest of Vendo consisting in conducting the complaint procedure, as well as to possible establishment, exercise or defence of legal claims in court and out of court.]

- g) **in order to conduct marketing activities and promoting Vendo's own products and services**

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(f) of the GDPR or the GDPR UK, i.e. Vendo's legitimate interest in promoting its own products and services. Sometimes, however, the basis for data

processing may not be Vendo's legitimate interest for this purpose, e.g. in the case of cookies that interfere with your privacy, and then the basis for processing will be your consent (article 6(1)(a) of the GDPR or the GDPR UK)]

- h) **to run Vendo's profiles (fanpage) on social media and other websites**, in particular to respond to reactions and comments.

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(f) of the GDPR or the GDPR UK, i.e. Vendo's legitimate interest in ensuring continuity of business communication.]

- i) **for the purposes resulting from your consent**. The purpose of processing for which we need your consent will be indicated in its content. We can use this basis for the processing of your personal data, for example in connection with the use of cookies and other technologies that may interfere with your privacy more and are not necessary for the maintenance of our website.

[If the GDPR or the GDPR UK applies: the basis is article 6(1)(a) of the GDPR or GDPR UK].

3. **Obligation to provide the data**

Providing data for most of the purposes referred to in point 2 is voluntary but at the same time necessary to use some services. For example: if you want to contact us using the contact form provided by us, or receive a newsletter from us, you will have to provide your data.

Failure to provide data will result in the inability to perform the activities for which the data is processed. Providing data is not a statutory requirement, but it may be a contractual condition or a condition for concluding an agreement (in the case of processing related to the possible conclusion or performance of an agreement with Vendo).

4. **The period of the data storage**

Your personal data will be processed for no longer than it is necessary to achieve the specific purpose described in this policy. This means that your personal data in connection with the correspondence, as well as in connection with the possible process of concluding or performing an agreement, will be processed for the period of limitation of potential claims, or for the period resulting from legal provisions, if applicable.

Personal data processed in connection with complaints will also be stored until the claims are time-barred.

In the case of a newsletter, the data will be stored for the duration of the newsletter service, which can be done by clicking on the unsubscribe link in the footer of each newsletter. It is possible, however, that Vendo will also process the data longer, if a claim arises that justifies the longer processing of data

In the case of processing related to marketing activities, the data will be processed until an effective objection is made.

In the case of processing based on your consent, personal data will be processed until it is withdrawn, and sometimes also for a shorter period, e.g. in connection with the expiry date of certain cookies.

Personal data processed by Vendo in connection with the running of social media profiles will be processed until they are deleted (in the case of comments and reactions, and in the case of correspondence, they will be processed until the above-mentioned time, i.e. until the claims are time-barred).

In the case of processing for purposes resulting from legal provisions, the data will be processed for the time specified in these provisions.

5. Profiling

Due to the tools used by Vendo, your personal data may be profiled, i.e. automatic evaluation of certain factors relating to you. Vendo performs profiling in order to appropriately select communication materials and materials promoting the activities of Vendo.

However, your personal data will not be processed in an automated manner that may affect your rights or have a similar effect on you.

Profiling is also beneficial for you, as you will receive information and materials in line with your preferences.

[If the GDPR or the GDPR UK applies: profiling for this purpose is performed based on the legitimate interest of Vendo (article 6(1)(f) of the GDPR or the GDPR UK), consisting in selecting appropriate content and information and promotional materials based on your profile.]

6. The recipients of the data

We work with external service providers to provide certain services. These service providers may use or transfer your personal data. The recipients of the personal data provided by you may include, in particular:

- ✓ entities operating IT systems or providing IT tools;
- ✓ companies providing marketing services;
- ✓ entities cooperating with us in handling legal matters;
- ✓ payment processors and banks;
- ✓ marketing agencies and advertising partners;
- ✓ entities providing accounting services;

In addition, we may disclose selected information to competent authorities (e.g. offices, courts, bailiffs and other institutions) or third parties who submit a request for such information based on an appropriate legal basis and in accordance with applicable law.

7. Social media and other sites

On the Vendo website, you will find plugins that link to our social media profiles, such as Twitter, LinkedIn and Facebook. You can also find us on Github, where our employees and associates share the results of their work.

Remember that while we are able to control the content posted directly on our website and the way in which your personal data is processed, we have no control over how the providers of the above websites process your data.

Familiarize yourself with the information below to know the risks of using the above-mentioned websites, as well as where to look for relevant information.

✓ **Twitter**

You can find our Twitter profile directly from the search engine or by using a plug-in on our website.

Twitter is operated by Twitter, Inc., 1355 Market Street, Suite 900 San Francisco, CA 94103, United States.

Information on how Twitter will process your personal data can be found here: <https://twitter.com/en/privacy>. If you want to know how Twitter uses cookies, you will find the necessary information here: <https://help.twitter.com/en/rules-and-policies/twitter-cookies>.

✓ **Github**

We are also available on Github.

If you want to learn more about the Github privacy and cookie policy, look here: <https://docs.github.com/en/github/site-policy/github-privacy-statement>

✓ **LinkedIn**

You can find our fanpage on LinkedIn directly from the LinkedIn search engine, or by using a plug-in on our website.

The LinkedIn privacy policy can be found here: <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn cookie policy can be found here <https://www.linkedin.com/legal/cookie-policy>.

Remember, however, that Vendo has no influence on the way LinkedIn will process your data. [If you are located within the EEA or the Great Britain, your data could be transfer outside the EEA or the Great Britain, especially to the USA].

Your personal data provided on the LinkedIn portal may also be available to the administrator of this portal, i.e. LinkedIn Ireland Unlimited Company (address: Wilton Place, Dublin 2, Ireland) or LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, in the United States.

✓ **Facebook**

We use the tools provided by Facebook in many ways. First of all, we run a fanpage on Facebook, which you can visit from the plug-in on our website, or by searching for it directly from the search engine.

The Facebook privacy policy can be found here: <https://www.facebook.com/about/privacy>. The Facebook cookie policy can be found here <https://www.facebook.com/policies/cookies/>

Remember, however, that Vendo has no influence on the way Facebook will process your data. [If you are located within the EEA or the Great Britain, your data could be transfer outside the EEA or the Great Britain, especially to the USA].

Your personal data provided on the Facebook may also be available to the administrator of this portal, i.e. Meta Platforms Ireland Limited (address: 4 Grand Canal Square, Grand Canal Harbor, Dublin 2 Ireland) or Meta Platforms, Inc. (address: 1601 Willow Road Menlo Park California).

Facebook, based on its own provisions and regulations, may collect and process the information contained in cookies of people visiting the fanpage. Based on the data collected in this way, Facebook can create anonymous statements and statistics (e.g. regarding the number or profile of fanpage visitors), which can be made available to Vendo as the fanpage operator.

[In this regard, if the GDPR or the GDPR UK applies Vendo and Meta Platforms Ireland Limited are joint controllers of your data in accordance with Article 26 of the GDPR or the GDPR UK with regard to data processing for statistical purposes.

Detailed information on mutual agreements between Vendo and Facebook (including information on the purpose of joint administration, responsibilities) is available at: https://www.facebook.com/legal/terms/page_controller_addendum].

8. Transfers of personal data to third countries or international organizations [if GDPR or GDPR UK applies]

Because we are an American company, your personal information will be used in the United States. Your continued use of our site means that you are aware of the above. By submitting your data or otherwise using the services, you agree to this transfer, storing or processing of your data in the United States.

We inform you about this because the Court of Justice of the European Union (CJEU), in its judgment of 16 July 2020 in the case C-311/18 Data Protection Commissioner v Facebook Ireland Ltd. and Maximilian Schrems, annulled the European Commission's implementing decision (EU) 2016/1250 on the adequacy of the protection provided by the EU-US Privacy Shield. Thus, the CJEU recognized the United States as a country that does not ensure an adequate level of personal data protection (in line with European Union standards).

You acknowledge and agree that your data may be accessible to law enforcement and governmental agencies in the United States.

9. Your rights under the GDPR and the GDPR UK

If you are located within the EEA or the Great Britain, the following rights apply to you:

- a) **the right to withdraw consent** to the extent that the basis for processing was the consent (article 7(3) of the GDPR or the GDPR UK). You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Withdrawal of consent does not entail any negative consequences,
- b) **the right to access data** (article 15 of the GDPR or the GDPR UK),
- c) **the right to request the rectification of your personal data** (article 16 of the GDPR or the GDPR UK),
- d) **the right to request the deletion of your personal data ('the right to be forgotten')** (article 17 of the GDPR or the GDPR UK),
- e) **the right to request the restriction of the processing of your personal data** (article 18 of the GDPR or the GDPR UK),
- f) **the right to transfer your personal data** (article 20 of the GDPR or the GDPR UK),
- g) **the right to object to the processing** of data due to a special situation to the extent that the basis for the processing of personal data is the premise of a legitimate interest (article 21 of the GDPR or the GDPR UK).

You can exercise all the rights described above by writing to Vendo on the data indicated in point 1.

In addition, if you believe that Vendo is processing your data in an unlawful manner, **you have the right to lodge a complaint with the competent supervisory authority**.

10. Your rights under the CCPA

A California residents have the following rights:

- a) **the right to know**, through a general privacy policy and with more specifics available upon request, what personal information a business has collected about them in the preceding 12 months, what it is being used for, whether it is being disclosed or sold, and to whom it is being disclosed or sold. Please note that much of the information you can make a request for is already contained in this privacy policy;
- b) **the right to correct inaccurate information;**
- c) **the right to "opt out" of processing or allowing a business to sell or share their personal information to third parties;**
- d) **the right to a have business, under certain circumstances, delete personal information;**
- e) **the right to be free from discrimination related to your exercise of your privacy rights;**
- f) **the right to use of an authorized agent to submit a request.**

If You live in California and would like to make such a request, please contact us on the data indicated in point 1.

11. If you are a Virginia or Nevada resident

Virginia residents have certain rights such as: access and data portability, correction, deletion requests. You also have the right to opt-out of selling, opt-out of processing of personal data for target advertising and opt-out of processing personal data for profiling. If You live in Virginia and would like to make such a request, please contact us on the data indicated in point 1.

Nevada residents have the right to submit a verified request directing us not to sell their personal information. If you live in Nevada and would like to make such a request, please contact us. However, we do not currently sell your personal information, as sale is defined in Section 603A of Nevada law. If You live in Nevada and would like to make such a request, please contact us on the data indicated in point 1.