

PRIVACY POLICY

At the Site we are committed to protecting and respecting your privacy. This notice describes how any personal data you provide to us will be processed.

For the purpose of the UK Data Protection Act 2018 and the General Data Protection Regulation 2016 („Law”), the data controllers for any personal information we hold about you is Develtio Sp. z o.o. registered in Warsaw, Poland, under address: ul. Koncertowa 3/5 m. 54 (02-787 Warsaw), in the Central Register and Information on Business Activity under number: 0000684368,

I. The scope of processed data.

1. DEVELTIO SP Z O.O. collects User personal data governing your purchase of NFTs as part of the “Breathless People” by Justyna Adamczyk NFT Collection Offering (the “Offering”), contact the Company, sign up for the marketing materials, browse the Site or use the other services offered by the Site or the Company. The data we collect includes details Users provide to the Company, such as your e-mail
2. Data collected in the profiling process are described in Chapter VIII below.

II. Personal Data Administrator.

1. The Administrator of the database is DEVELTIO SP Z O.O., registered in Warsaw, Poland, under address: ul. Koncertowa 3/5 m. 54 (02-787 Warsaw), in the Central Register and Information on Business Activity under number: 0000684368.
2. The Store's personal data administrator ensures the security of personal data provided by Users. The Administrator complies with the provisions of applicable law, including the European Union General Data Protection Regulation (GDPR) of 27 April 2016, in particular by fulfilling the obligations arising therefrom and allowing Users the right to inspect their own data, the right to request their update and removal and the right to object in the cases indicated in the provisions of the above Act.
3. The Administrator uses appropriate technical and organizational measures to ensure the protection of processed data, in particular, protects data against their disclosure to unauthorized persons, as well as against their processing in violation of applicable law.

III. The purpose of processing personal data.

1. Users' personal data are processed only for the purposes specified in generally applicable law and Terms and Conditions, in particular to the extent necessary to provide services and for statistical measurements. and the Administrator's own marketing (legitimate interest of the administrator in accordance with art.6 §1.F GDPR) i.e.
 - a) in connection with contracts concluded with the Company (sales, User Account services, marketing communication),
 - b) to determine, investigate or defend against claims related to the contract concluded with the User or the processing of personal data, because the processing is necessary to implement the legitimate interest of DEVELTIO SP Z O.O.;

- c) to meet the legal obligations incumbent on DEVELTIO SP Z O.O. because processing in this case is necessary to meet the legal requirements to which DEVELTIO SP Z O.O. is subject (legal basis: art.6 §1.C GDPR).
- 2. The processing of Users' personal data for purposes other than those indicated above will take place only after obtaining the consent of the User and to the extent specified in the consent.
- 3. The Company collects and process only the data that is required to allow the Company to provide our services to Users. Passing of the personal data is voluntary, but necessary to participate in the sale operations of the Company and conclusion of the agreement with the User in accordance to the Terms and Conditions and the lack of passing of the personal data results in the lack of possibility of cooperation with the Company.

IV. The period of personal data processing.

- 1. Personal data obtained as a result of the conclusion of the contract are processed from the moment they are obtained from the User until:
 - a) the end of the period provided for submitting the complaint procedure,
 - b) requesting cessation of personal data processing.
- 2. We process personal data obtained on the basis of the consent of their owner from the moment of granting the relevant consent until its withdrawal / request to cease processing of personal data / request removal of personal data processing by the data owner.
- 3. We process data collected as part of profiling from the moment the User starts using the website until he objects to profiling.
- 4. In order to determine, pursue or defend against claims - personal data are processed until the time limitations for contractual claims or claims related to the processing of personal data.
- 5. Personal data processed in connection with the Administrator's (tax) statutory obligation will be stored for the period indicated in the relevant act and for the purpose indicated therein.

V. Transfer of personal data.

- 1. The administrator transfers your data only to its subcontractors (e.g. programming companies), and at the request of entities authorized to obtain them under applicable law (e.g. courts). Your data will not be transferred outside the EEA or made available to international organizations, subject to point 2 and 3 below.
- 2. The Administrator's website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to enable the website to analyze how users use it. The information generated by the cookie about your use of the website (including its IP address) will be transmitted to Google and stored by it on servers in the United States. Google will use this information to evaluate your use of the website, to compile reports on website activity for website operators and to provide other services related to website activity and internet usage. Google may also transfer this information to third parties if it is required to do so on the basis of legal provisions or if such persons process such information on behalf of Google. Google will not associate your IP address with any other data in its possession. The user may opt out of cookies by selecting the appropriate settings on the browser, however, please note that in this case you may not be able to use all the functions of the website. By using this website, you consent to Google processing your data in the manner and for the purposes set out above.
- 3. External suppliers, including Google, may display advertisements ordered by the Administrator on websites providing their advertising space. These providers, including Google, may use cookies to

display ads based on your previous visit to the Store and its associated websites. The user may opt out of the use of Google cookies and disable them on the Google ads options page.

4. For any doubts regarding personal data, please write to us: info@develtio.com

VI. Data owners' rights.

1. You have the right to access your data and the right to rectify, delete, request restriction of processing, the right to transfer data, the right to object, the right to withdraw consent to data processing at any time without affecting the lawfulness of the processing which was made on the basis of consent before its withdrawal.
2. Consent may be withdrawn by sending an e-mail to the address (e-mail address: info@develtio.com) from the address to which the consent relates.
3. To the extent that your data is processed on the basis of a legitimate interest of DEVELTIO SP Z O.O., you have the right to object to their processing due to a special situation.
4. You have the right to transfer your personal data, i.e. the right to receive your personal data from DEVELTIO SP Z O.O. in a structured, commonly used, machine-readable IT format.
5. You also have the right to lodge a complaint with the UODO if you find that the processing of your personal data violates the provisions of the European Union General Data Protection Regulation data of April 27, 2016.

VII. Legal grounds for data processing.

1. The Company processes your data on a legal basis in accordance with applicable regulations.
2. The legal basis for data processing for the provision of services to Users DEVELTIO SP Z O.O. is the contract (specified in the Regulations), or appropriate consent.
3. DEVELTIO SP Z O.O. must use Users' data to implement the Company's services. These activities also include the development of the webpage, matching the displayed content to the individual preferences of Users, making analyzes to improve the services provided, and mechanisms to ensure security.
4. The legal basis for statistical measurements and proprietary marketing DEVELTIO SP Z O.O. is the so-called legitimate interest of the administrator in accordance with art. 6 clause 1 lit. F GDPR.
5. The legal basis for the processing of personal data for purposes other than the above is the separate voluntary consent of their owner.

VIII. Profiling.

1. Profiling is the processing of your data in an automated manner for analytics and advertising. All data owners have the right to object to profiling.
2. Profiled advertisements allow you to avoid a larger part of random ads (displayed on websites visited by you), and are shown in those that are tailored to individual expectations. The profiling used by DEVELTIO SP Z O.O. is largely limited to gender, age and preferences related to DEVELTIO SP Z O.O. Thanks to it, the advertisement you see will resemble an offer that meets your individual needs. Opposition to profiling will cause ads to be displayed randomly, regardless of your preferences.
3. Information contained in system logs may contain various data, eg IP address. The User agrees to their use only for technical purposes and to collect general, statistical demographic information as well as to determine the city in which the User lives.

4. DEVELTIO SP Z O.O. uses cookies, i.e. text files saved on the User's computer, identifying him as necessary to enable some operations. Cookies are used to:
 - a) adapting the content of the pages to the User's preferences and optimizing the use of the website; in particular, these files allow to recognize the User's device and properly display the page tailored to his individual needs;
 - b) collecting statistics that inform about how Users use websites, which allows improving their structure and content;
 - c) maintaining the User's session after logging in, thanks to which the User does not have to re-enter the login and password on each subpage;
 - d) matching the content of ads to the interests of users.
5. The following types of cookies are used within DEVELTIO SP Z O.O.:
 - a) "necessary" cookies, enabling the use of services available under DEVELTIO SP Z O.O., e.g. authentication cookies used for services requiring authentication under DEVELTIO SP Z O.O.;
 - b) cookies used to ensure security, e.g. used to detect fraud in the field of authentication under DEVELTIO SP Z O.O.;
 - c) "performance" cookies, enabling the collection of information on how to use DEVELTIO SP Z O.O. websites;
 - d) "functional" cookies, enabling "remembering" the settings selected by the User and personalizing the User's interface, eg in terms of the language or region of the User's origin, font size, website appearance, etc .;
 - e) "advertising" cookies, enabling users to provide advertising content more tailored to their interests

Restrictions on the use of cookies may affect some of the functionalities available on DEVELTIO SP Z O.O. websites.