PRIVACY POLICY

I

Processing of personal data

1. Given that **PixBlocks** is processing **the Users'** personal data within **the Application**, respecting **the Users'** right to privacy, in order to ensure the protection of personal data and to provide **the Users** with sufficient information with this regard, this Security Policy, constituting **an Attachment** to and an integral part of **the Regulations** (hereinafter the Policy) is hereby made available.

2. The terms used in **the Policy** and written in capital letters have meanings specified in **the Regulations,** unless specified otherwise.

3. The personal data in **the Application** are processed pursuant to the 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) (hereinafter "GDPR"),

4. The Application collects **the Users'** personal data provided by **the Users** at **Registration**, i.e. their first name, last name, avatar, e-mail address, age, location, and during Registration in the Pix Programming Challenge Contest, i.e. the contestant's first name, last name, e-mail address (or their legal guardian's e-mail address), the legal guardian's first name (if the contestant is younger than 13 years old), the legal guardian's last name (if the contestant is younger than 13 years old), the contestant's or legal guardian's telephone number, school name and town.

5. For users who are teachers this also includes the school's name, address, telephone, e-mail address, class name and class composition.

6. The data collected at **Registration** are necessary to create **a User's Account** in **the Application** to allow them to use services provided within **the Application**. **The User** has access to the data through their **Account** and can manage them.

7. The data collected at **Registration** to **the Pix Programming Challenge Contest** are necessary to conduct the Pix Programming Challenge Contest.

8. The data collected when **the User** is using **the Application** are stored in **the User's Profile** and serve to ensure the correct operation of services within **the Application** and to create **Statistics** within which data pertaining to the solved **Tasks** and **the Users'** activity are generated.

9. The personal data are protected with physical safeguards, organizational procedures and system software.

10. The applied safeguards guarantee:

    a. compliance with law, reliability and transparency - understood as processing that is compliant with law, reliable and transparent for **the User**,

    b. purpose limitation - understood as the collection of personal data for specific, clear and legally justified purposes and not processing them further in a manner non-compliant with these purposes,

    c. minimisation of data - understood as processing of personal data adequately, appropriately and limited in scope that is necessary for processing purposes,

    d. correctness - understood as processing of personal data that are correct and updated, if needed,

    e. storage limitation - understood as storing personal data in a manner allowing the identification of an individual to whom they pertain, for a period that is not longer than necessary for purposes for which they are processed,

    f. integrity and confidentiality - understood as being necessary for purposes for which they are processed,

    g. processing in a manner ensuring adequate safety of personal data, including protection against unauthorized or illegal processing and accidental loss, destruction or damage, by means of relevant technical or organizational measures.

II nds for and purposes of processing of personal data and purposes

The User's personal data are processed in **the User's Account** and **Profile** on the basis of:

    a. Art. 6 Section 1 Item b) of GDPR, namely in order to provide services to the User within the Application, and in particular:

      – to provide access to the Application's tools and data bases within the Application'
      – to authenticate the User when logging in the Application.

    b. Art. 6 Section 1 Item c) of GDPR, namely in order to fulfil the obligations of a controller as stipulated in legal regulations;

    c. Art. 6 Section 1 Item a) of GDPR, namely on the basis of the User's consent for processing personal data, e.g. with regard to notification within the Application;

III gories of recipients of the Users' personal data

The Users' personal data may be transferred to the following entities:

    a. Organizers who have an active **Account** and **Profile** within **the Application**;

    b. **Clients** who have an active **Account** and **Profile** within **the Application**, provided **the User** – **Task Solver** has started solving **a Task** introduced by **the Client**;

    c. entities providing legal, accounting and tax services for **the Application** and **PixBlocks**.

PixBlocks does not intend to transfer **the Users'** personal data to any third countries or international organizations.

IV   **The Users' Rights**

    1. **The User** has the right to require confirmation that their personal data are processed as well as obtain a copy of personal data being processed.

2. In case such personal data are incorrect or incomplete, **the User** has the right to require their rectification.

3. **The User** has the right to request the erasure of their personal data, i.e. **the User** has the right to be forgotten, unless the processing of their personal data is necessary for adjusting, settling or defending legal claims.

4. In cases specified in Art. 18 of GDPR, **the User** has the right to require the processing of your personal data to be restricted.

5. Since the basis for data processing in this case is not Article 6, Item e or f of GDPR, **the User** is not entitled to object to processing of their personal data.

6. **The User** has the right to obtain their personal data, which they have provided to **PixBlocks**, in a structured, commonly accepted, machine-readable format and transfer them to another controller or require **PixBlocks** to transfer such data directly to the controller of your choice.

7. **The User** has the right to file a complaint to the supervisory authority concerned if they suspect **PixBlocks** is processing their personal data in violation of the provisions of GDPR.

8. **The User** has the right to revoke their authorization to have their personal data processed in any moment, regardless of the legal compliance of the processing that has been done based on their authorization before its revocation.

9. The execution of the stipulated rights is done by mailing a notification to: contact@pixblocks.com.

In order to summarize the presented information, they have been collected in the following table:

1.	Controller of your personal data	The controller of your personal data, i.e. an entity deciding about the manner in which these data are used, is PixBlocks Sp. z o.o., headquartered in Poznań, address: ul. Gromadzka 12, 61-655, Poznań (KRS: 0000807836, NIP: 9721304226, REGON: 384602230) (further referred to as "Company" or "Controller").
2.	Contact regarding the processing of your personal data	In order to obtain detailed information about personal data processing as well as any matters related to the processing of personal data, the Controller should be contacted in writing by sending correspondence to PixBlocks Sp. z o.o., headquartered in Poznań, address: ul. Gromadzka 12, 61-655, Poznań, or electronically at the e-mail address: contact@pixblocks.com.
3.	Scope of personal data being processed by the Company	1. first name(s) and last name; 2. e-mail; 3. telephone; 4. status; 5. avatar; 6. age; 7. location; 8. logging frequency; 9. activity within the application. For teachers: 1. school name, 2. school address, 3. school telephone, 4. school e-mail, 5. class name, 6. class composition. For contestants: 1. contestant's first name(s) and last name, 2. legal guardian's first name(s) and last name, 3. contestant's e-mail, 4. legal guardian's e-mail, 5. contestant's telephone, 6. legal guardian's telephone, 7. contestant's age, 8. contestant's location,

		9. activity within the application.
4.	**Purpose(s) of data processing (including legal basis)**	The personal data you provide to us are processed for the following purposes: providing services within **the Account** and **Profile** of **the Task Solver / Organizer** within **the Application**, in particular the access to **the Application's** tools and data bases within **the Application** (grounds Art. 6 Section 1 Item b) of GDPR)
5.	**Categories of entities receiving the personal data**	Your personal data may be transferred to the following entities processing data on behalf of the Company: a. Organizers who have an active **Account** and **Profile** within **the Application**; b. **Clients** who have an active **Account** and **Profile** within **the Application**, provided you have started solving a Task introduced by **the Client** and expressed your consent for contact; c. entities providing legal, accounting and tax services for the Company.
6.	**Information about the intention to transfer the collected personal data to third countries or international organizations**	The Company does not intend to transfer your personal data to any third countries or international organizations.
7.	**The period for which the personal data will be stored**	The personal data transferred by you will be stored during the time you have **the Account** and **Profile** within **the Application** and for 6 months after you delete your **Account** within **the Application**. After expiration of the terms specified above, your personal data will be erased or anonymized.
8.	**Right to access**	You have the right to require confirmation that your personal data are processed as well as obtain a copy of personal data being processed.
9.	**Right to rectification**	In case your personal data are incorrect or incomplete, you have the right to require their rectification.
10.	**Right to erasure**	You have the right to request the erasure of your personal data, i.e. you have the right to be forgotten, unless the processing of your personal data is necessary for adjusting, settling or defending legal claims.

11.	**Right to restriction of processing**	In cases specified in Article 18 of GDPR, you have the right to require the processing of your personal data to be restricted.
12.	**Right to object**	Since the basis for data processing in this case is not Article 6, Item e or f of GDPR, you are not entitled to object to processing of your personal data.
13.	**Right to data portability**	You have the right to obtain your personal data, which you have provided to the Company, in a structured, commonly accepted, machine-readable format and transfer them to another controller or require the Company to transfer such data directly to the controller of your choice.
14.	**Right to complain**	You have the right to file a complaint to the supervisory authority concerned if you suspect the Company is processing your personal data in violation of the provisions of GDPR.
15.	**Right to revoke authorization**	You have the right to revoke your authorization to have your personal data processed in any moment, regardless of the legal compliance of the processing that has been done based on your authorization before its revocation.
16.	**Provision of personal data**	In order to register in **the Application**, you are required to provide the personal data specified in **the Application**. The provision of personal data is voluntary, but failure to provide the data makes it impossible to **Register** and to use the services within **the Application**. In order to register in **the Pix Programming Challenge Contest**, you are required to provide the personal data specified in **the Application**. The provision of personal data is voluntary, but failure to provide the data makes it impossible to **Register for the Contest** and to participate in **the Contest**.
17.	**Information about the automated decision-making and profiling**	The Company does not employ automated decision-making, but employs profiling based on the data you provided for positioning your personal competences against the competences of other **Task Solvers**. The purpose of profiling is to ensure a cooperative model of cooperation in recruitment projects and to match recruitment projects to your needs and competences.