

Privacy Policy of Pixblocks Ltd.

The purpose of this Privacy Policy is to present information regarding the processing of personal data, the rules for the use of cookies and other technologies during the use of the Website and the services provided by the Personal Data Administrator (ADO).

The Administrator strives to continuously improve its procedures and the security of personal information, so this Privacy Policy is subject to change. Accordingly, the Administrator encourages you to regularly check the contents of this document for updates.

Date of last update: **01.06.2022 r.**

I. Definitions

The terms used in the Privacy Policy have the following meanings:

Personal data - any information about an identified or identifiable natural person; personal data as defined in Article 4(1) of the RODO;

The EEA - European Economic Area is a free trade zone and common market that includes the countries of the European Union and the European Free Trade Association, except Switzerland;

Cookies - popularly known as cookies - are computer data recorded in the form of text-number files, which are placed on the User's terminal equipment. Such a terminal device may be a cell phone, laptop, tablet;

Privacy Policy - this document regulating the protection of personal data and the rules for the use of cookies and other technologies under the mandatory provisions of the law, including the RODO, the Act on the provision of electronic services and the Telecommunications Law.

RODO - Regulation EU 2016/679 of the European Parliament and of the Council of April 27, 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);

Portal - websites available at www.pixblocks.com, www.pixgamer.pl and all its sub-sites, including all services provided at the domain i.e. Contact form, newsletter, form for posting comments, order form;

UŚUDE - Act on Providing Services by Electronic Means - Act of July 18, 2002 on Providing Services by Electronic Means (Journal of Laws No. 144, item 1204, as amended);

Law - Law of May 10, 2018 on the protection of personal data (i.e., Journal of Laws of 2019, item 1781).

PT - Telecommunications Law - Act of July 16, 2004 on Telecommunications Law (Journal of Laws No. 171, item 1800, as amended);

The terms described in this section are for ease of use in this Privacy Policy; they may be capitalized or lowercase, which does not change the meaning given to them.

II. Administrator

1. The administrator of the personal data is PIXBLOCKS Spółka z ograniczoną odpowiedzialnością with its registered office in Poznań (61-655) at Gromadzka 12 Street.

2. ADO has appointed a Data Protection Officer (referred to as "DPO"). (3) Contact with the DPO is possible by e-mail or postal mail. e-mail address of the DPO: krzysztof.jankowski@litwic.pl Adres postal address of the DPO: IOD PIXBLOCKS, 12 Gromadzka Street, 61-655 Poznań.

III. Co-administrators

The co-controllers of your personal data are:

- Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02X525, Ireland (formerly Facebook Ireland Limited).
- LinkedIn Ireland Unlimited Company, address: Legal Dept. (Privacy Policy and User Agreement), Wilton Place, Dublin 2, Ireland.

Co-administration is related to the Administrator's use of social media platforms, namely Facebook, owned by Facebook Inc. and LinkedIn, owned by LinkedIn Corporation. In addition to this, the Portal uses social plug-ins directing to social networks Facebook, on which the Administrator has profiles of a business nature, and LinkedIn of a personal nature.

Details of the Facebook fanpage, Facebook group or LinkedIn and social plugins are described in Section XIII Tools Used. Facebook and LinkedIn.

IV. Legal basis and purposes of personal data processing

1. Your personal data may be processed: on the basis of consent (Article 6(1)(a) RODO) for:

- saving data in cookies that are not necessary for the functioning of the Portal;
- Sending the newsletter (Article 10 of the U.S. EPA and Article 172 of the PT);
- To respond to inquiries,
- to perform activities aimed at concluding a contract, to conclude and perform a contract the subject of which is the implementation of the Classes for the Student or by the Tutor,

- Improving the functionality of the website,
- improving the functionality of the PixBlocks Application.
- Collection of statistics relating to task performance,
- Execution of the contract for the Account, maintenance of the history of task completion, progress made,
- To carry out the certification of the Tutor,
- Fulfillment of fiscal obligations under the law (issuance and storage of accounting documents),
- handling complaints, ensuring the safety of the Student and the Tutor,
- conducting an audit of the Classes,
- Conducting marketing and sales activities,
- assert or defend against claims.

2. Due to the necessity to conclude and/or perform a contract or to take action upon request (Article 6(1)(b) of the DPA) for:

- to send an offer of the Administrator's services or products;
- performance of the service or execution of the concluded contract.

3. Due to the need to fulfill a legal obligation of the Administrator (Article 6(1)(c) of the DPA) in order to:

- ensure accountability and demonstrate compliance with obligations imposed on the Administrator by law, including the creation of records and other documentation under the RODO;
- to issue an invoice, bill or fulfill other obligations under tax and accounting regulations, including for archival purposes.

4. Legitimate legitimate interest (Article 6(1)(f) RODO) for:

- use of files cookies technicalnature , necessary for the functioning of the Portal;
- Ensuring the security of applications and websites;
- management, including improving its functionality and operational efficiency;
- creation of databases;
- operate a Facebook and LinkedIn account under the name "PixBlocks - Programming for kids and teens!" and interact with users of these social media sites;
- operate Facebook fanpages (fanpages) under the name "PixBlocks - programming for children and young people" and "I teach programming with PixBlocks" and interact with users of these fanpages;
- to send a newsletter as direct marketing of its own products;
- Conducting research and analysis of supported websites, among other things, in terms of functionality and improvement of its operation, as well as satisfaction with the services and products offered;
- to contact you, in particular for feedback on the training package you purchased;
- establish, assert or defend against claims;

- storage of data for archival and evidentiary purposes, for the purpose of securing information that can be used to prove facts.

The specific purposes of processing personal data on social networks are discussed in Section: IX Tools Used.

V. Recipients of personal data

The Administrator's business activities are supported by external entities to which the Administrator transfers your personal data. The recipients of your personal data will be our Trusted Partners - entities providing legal, accounting, tax services, as well as IT service providers for data hosting and business mail services.

Data recipients:

Kancelaria Radców Prawnych Litwic&Litwic sp.p. - Topolowa 8/9/2, 80-255 Gdańsk- an entity providing legal care and advice in the field of personal data processing;

EON Partner Sp. z o.o. - Smardzewska 18/1, 60-161 Poznań - entity providing accounting and tax services;

Comarch SA - Al. Jana Pawła II 39A, 31-864 Kraków - the entity providing the invoicing system;

Pipedrive Inc - 460 Park Ave South New York, NY 10016, USA - cloud-based software as a service company, sales customer relationship management tools

Azure platform - Microsoft Azure US East at 101 Herbert Drive - the base used by the application itself PixBlocks - a smart SQL database in the cloud

Sendinblue - 7 Rue De Madrid 75008, Paris, France - the entity that provides the system for sending the newsletter;

PayU - headquartered in Poznań (60-166), 196 Grunwaldzka St. - handling payment system and electronic transactions;

Meta Platforms Ireland Limited - 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02X525, Ireland - the entity providing the platform on which the website (fanpage) and the online group on the Facebook platform are located;

LinkedIn Ireland Unlimited Company - Legal Dept. (Privacy Policy and User Agreement), Wilton Place, Dublin 2, Ireland - the entity that provides the platform on which the social profile is hosted;

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland - an entity that provides a security tool for the Service and a tool for analyzing statistics (Google Analytics);

GetResponse Joint Stock Company - based in Gdansk, Arkońska 6/A3 Street, 80-387 Gdansk, KRS 0000942075, NIP 9581468984 - an entity providing a system for sending newsletters and handling webinars and online trainings;

Yo!Coach - Fatbit Pvt. Ltd. Plot No. 268, Sector 28, JLPL Industrial Area, Punjab, 140308 Software integrated with a set of interactive features to enable seamless navigation and workflow for both users and Data Administrator, technical and organizational support;

Zapier LLC - 548 Market St. # 62411, San Francisco, California, 94104, United States- is a product that enables end-to-end integration of used web applications and automation of workflows;

Make - owned by Celonis - manages, executes and explores processes enabling final integration of databases;

VI. Collection of non-personal data.

The Administrator cooperates with WordPress-Polska.pl - WordPress-Polska.pl Portal does not process, share or use for marketing purposes the data provided by Portal Users. The data collected in this way will not be processed, shared or used for any other purposes than simple collection of statistics.

When you use WordPress-Poland.co.uk, we collect non-personal data that browsers provide, namely:

- name and version of web browser
- language settings
- referring page
- date and time the request was sent to the server
- IP from which the request was sent
- User preferences and acceptance of cookie settings. IP addresses collected by the portal are not intended to identify users, nor are they disclosed anywhere.

Hangouts, Meet and Wayk Now

Use of our services may in some cases require you to install and run Hangouts, Meet and Wayk Now applications.

Hangouts and Meet is Google's instant messaging alternative to communicating through the PixBlocks Meeting app.

You can find information about the application's operation and privacy policy [here](#) and [here](#).

Wayk Now is an app that allows a Tutor to remotely show a Student how to complete a task. All information about the processing of personal data in connection with the use of this application is available here.

VII. Transfer of personal data to a Third State or International Organization

The Administrator works with entities that are based in the EEA. However, due to the use of international entities such as Facebook Ireland Limited LTD, LinkedIn Corporation, Google Ireland Limited, it may cause your personal data to be transferred outside the EEA or to a country with restrictions on the international transfer of personal data. In such a situation, the compliance mechanisms provided for in the RODO, including the standard contractual clauses set by the European Union Commission, are applied.

VIII. Disclosure of personal data

The Administrator reserves the right to disclose your personal data in a situation where this will result from a legal obligation imposed on the Administrator, including the transfer to competent law enforcement agencies.

IX. Period of storage of personal data

Personal data are kept for the time necessary to fulfill the purpose for which they were collected, in particular:

- personal data processed in connection with subscribing to the newsletter
- for the period of operation of the newsletter or until the time of withdrawal of consent. Note, however, that after withdrawal of consent, your personal data may still be processed for the purpose of establishing, investigating or defending against possible claims in accordance with the statute of limitations for such claims;
- personal data processed in connection with the handling of the contact form for the period necessary for the handling of the request/inquiry, and thereafter for the archiving period to secure the information in case for the purpose of establishing, investigating or defending against possible claims in accordance with the statute of limitations for such claims;

Other personal data processed under consents:

- until your consent is withdrawn or the purpose of the processing is achieved. However, after withdrawal of consent, your personal data may still be processed for the purpose of establishing, investigating or defending against possible claims in accordance with the statute of limitations for such claims;
- personal data processed because of the need to perform a contract or take action on a request
- for the period of discussions and negotiations preceding the conclusion of a contract or the performance of a service with respect to the data provided in the request for proposal, or for the period of performance of the service and cooperation, as well as for the period of limitation of claims under the law;

Personal data processed on the basis of the Administrator's legitimate interest:

- Until the effective filing of an objection filed under Article 21 of the DPA. Personal data processed in connection with the performance of the Administrator's legal obligations:
- For the period required by law, including tax law, accounting law, RODO.

Personal data processed in connection with the Administrator's use of social media platforms including the use of Facebook, LinkedIn application functionality:

- For the duration of the existence of company pages, groups or accounts on a given social network.

Personal data processed for analytical purposes and in connection with the administration of the website:

- Until such data becomes obsolete or no longer useful. Personal data processed in connection with the establishment, investigation or defense of claims:
- Until the expiration of the statute of limitations.

X. Your entitlements

In connection with the processing of your personal data, you have the following rights:

- The right to request access to personal data and to receive a copy;
- The right to request rectification of personal data;
- The right to request deletion of data;

- The right to restrict the processing of personal data;
- The right to object to the processing of your personal data when the processing of your personal data is carried out on the basis of a legitimate interest of the Administrator, and the objection is justified by the particular situation in which you find yourself;
- The right to portability of personal data;
- The right to lodge a complaint in connection with the processing of your personal data to the supervisory authority, which is the President of the Office for Personal Data Protection;
- The right to withdraw the consent on the basis of which the Administrator processes your personal data. However, this will not affect the lawfulness of the processing that the Administrator performed prior to the withdrawal of consent. In some cases, your personal data may not be completely deleted and will be retained for the purpose of defending against possible claims for a period of time in accordance with the law or in order to comply with legal obligations imposed on the Administrator.

Your rights are not absolute and do not apply to all personal data processing activities.

XI. Requirement for personal data

Provision of personal data is voluntary. However, failure to provide certain personal data may result in the inability to use a given functionality of the Portal or the inability to perform a service.

XII. Automated decision-making, including profiling

The Administrator analyzes personal data of newsletter subscribers, browsing history of the Portal, activity history on its social media profiles and groups on Facebook, LinkedIn platforms. The analysis in question is undertaken in an automated manner on the basis offered by data service providers, such as the newsletter provider. However, the data analysis will not have any legal effect on you or similarly significantly affect your situation, including your rights or freedoms. The purpose of automated data processing is for the Administrator to learn the preferences of recipients in order to tailor the content, offers or communications created by the Administrator to those preferences. The Administrator may direct dedicated and personalized offers to you through individualized email, postal or web-based communications on its own or external communication channels.

Nevertheless, the Administrator informs you that you have the right to object to profiling that could affect your rights and obligations.

XIII. Cookies

The portal uses its own cookies and external cookies, which are used for:

- The proper functioning of the website, including improving its navigation;
- to remember your cookie preferences;

- To ensure the security and management of the Portal;
- statistical and analytical research;
- connecting to social networks;
- proper functioning of the e-store, including abandoned shopping carts;

When you visit the Portal for the first time, a message about the use of cookies is displayed, along with a question about your consent to the use of cookies. By clicking on the button "I agree", you consent to the use of cookies, unless you later decide to disable them. You also have the option of not agreeing to the use of cookies - by clicking on the "I do not agree" button. In this situation, only proprietary cookies that are necessary for the proper functioning of the Portal will be used.

You have the option to configure your Internet browser in such a way that it does not store cookies. Unfortunately, this may hinder the proper functioning of the Portal. You can also use the incognito mode offered by web browsers. In that case, cookies will be deleted the moment you close your browser.

The links below provide information on how to delete cookies in the most popular web browsers: Chrome Firefox Internet Explorer Opera Safari.

Moreover, you can prevent the cookie from collecting data via Google by downloading installing plug-in: plug-in. If you use the application without changing your web browser, the Portal will use cookies for the purposes listed.

Since cookies are also used to remember your cookie preferences, you should be aware of the consequences associated with changing your settings, in particular:

- If you disable the ability to save cookies on your end device, you may not be able to use its functionality, and some content may not be visible;
- If you use a different terminal device, profile on your computer or web browser, it will be necessary to redefine your cookie preferences.

The consequence of accepting cookies is that the memory of the device you use, such as a tablet, computer or phone, will be fixed with information from the provider of the service in question, over which you will have no control.

XIII. Tools used

The Administrator uses the following tools to improve its business operations, including the Portal it has created:

Contact form

A contact form has been provided on the Portal. In order to use the contact form, you are asked to provide your name, e-mail address, subject of the message and the data provided in the body of the message. The personal data in question will be processed in accordance with this Privacy Policy in order to contact you. In the course of using the contact form, the Administrator also collects personal data in the form of your IP address and your browser signature. The above personal data are necessary in connection with the security measures used on the Portal, which help, among other things, in detecting spam.

Order form (Payment details) in the Store

When placing an order in a store operated by PixBlocks Sp. z o.o. available on the Website, you must provide certain data in accordance with the rules contained in the Regulations in order to execute the order, conclude the Agreement, as well as for the purpose of fulfilling legal obligations imposed on the Administrator, settlements, processing claims. These are mainly: name, surname, e-mail address, contact telephone, company name, Tax Identification Number (NIP), address of residence or registered office of the company, or delivery address.

Social media - Facebook fanpage, Facebook group, profile on LinkedIn

Your personal data provided on the Fanpage, Facebook group will be processed for the purpose of administering and managing the Fanpage/Facebook group, communicating with you, including answering your questions, interacting with you, informing you about organized events, interesting information, services and products offered by the Administrator, creating a community Fanpage/Facebook group.

The basis for their processing is your consent. You voluntarily choose to like/observe/interact with the profile/page/group on the respective social network. The rules of the fanpage and group on Facebook are set by the Administrator, however, the rules of staying on the social network Facebook are based on the rules of the company Facebook Co-administrator), and in the case of LinkedIn, on the rules of the company LinkedIn. At any time, you can stop watching or even block the Administrator's profile created on Fanpage/LinkedIn. Due to the nature of the platforms used by the Administrator, only the use of the option

"block user" will result in no content created by the Administrator being displayed to you. For the rest, the content available on the relevant social media platform is common. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

The administrator processes your publicly available personal data, such as your name or general information, which is posted on your profiles and marked public. The processing of other personal data is carried out by the social network Facebook or LinkedIn and under the terms and conditions of their regulations.

Social plugins

The Portal uses plug-ins directing to social networks Facebook, LinkedIn and plug-ins that allow sharing content on these Social Networks, in particular "Share". The plug-ins in question are marked with the logo of the respective Social Network.

Data is sent to social networks only if you actively click on the corresponding plug-in button. After clicking on the plug-in icon, your web browser will initiate a connection to the servers of the respective social network, and you will be

redirected to the website of a third-party service provider, i.e. the owner of the respective Social Network, and your web browser will establish a direct connection to the servers of these Social Networks. The use of these features may involve the following.

Using external cookies. From the moment you click on the respective plug-in, your personal data is processed on the respective social network, and the owner of the social network becomes the co-controllers of your personal data. More about co-administrators is described in Section III of the Privacy Policy. The Administrator informs you that from the moment you actively click on the plug-in button, the Administrator has no influence on the nature and scope of the personal data collected by the respective social network.

The data is transferred regardless of whether you have an account on a particular social network or whether you are logged in. If you are logged in on a particular social media platform (e.g. LinkedIn, Facebook), the personal data collected will be directly assigned to the account (profile) you use.

reCAPTCHA

The Portal uses a service from **Google LLC**, the purpose of which is to secure the Portal and limit the possibility of sending data not filled out by a human, but generated by programs or bots. In the course of using this tool, there is an occasional examination of whether the behavior of a visitor to this site does not bear the hallmarks of robot behavior, and in such a situation personal data (IP address) is collected, the recipient of which is Google LLC.

For more information on the reCAPTCHA tool, please see [the privacy policy](#) and [the tool's statement](#).

Analytical tools

As part of the Portal, the Administrator uses:

- Statify plug-in to analyze statistics. The plug-in used does not collect any unnecessary or personal information, nor does it require cookies. The plug-in does not collect IP addresses, because it counts not users, but the number of impressions;
- Google Analytics tools. A special tracking code has been installed in the code of the Portal's website, which uses cookies from Google LLC regarding the Google Analytics service. You have the option to block the tracking code at any time by installing a browser add-on provided by Google add-on.

Information about the use of the Portal generated by the cookie is usually sent to a Google server in the USA and stored there. Google Analytics has been extended on the Website with the code "gat._anonymizeIp();" to provide anonymous recording of IP addresses (so-called IP masking). By anonymizing the IP address on the Service, the user's IP address is truncated by Google LLC within the EU and Treaty States of the European Economic Area. Only in exceptional cases is the full IP address sent to a Google LLC server in the USA and shortened there. The Google Analytics tool uses information such as: information about the operating system and the web browser you are using, the subpages viewed within the Portal, the time rushed on the Service and its subpages, transitions between subpages of the Service, the source from which you go to the Portal. Google Analytics and Google Analytics 360 services

have been certified to the independent security standard ISO 27001. ISO 27001 is one of the most widely recognized standards in the world and certifies that the systems operating Google Analytics and Google Analytics 360 meet the relevant requirements.

Tagging your site with Google Ads tool

The Administrator has added a global site tag to his site to set up a source of audience data in his site or applications to help reach people who have visited the site or used the Administrator's applications. A global site tag is a library for tagging websites that allows Google to measure their effectiveness, track conversions and apply services that use data segments.

The administrator also uses the statistical functions available on social media profiles, i.e. Facebook, LinkedIn, provided by the owners of these portals.

Newsletter

The administrator processes personal data of its subscribers in the form of name and e-mail address. These fields are mandatory. Providing these personal data is voluntary, but necessary to send the newsletter. In order to add your e-mail address to the list of subscribers, you will be asked to confirm the subscription. Confirming your subscription will add you to the newsletter mailing list database.

Subscribing to the newsletter means that you consent to the sending of marketing and commercial information to you by means of electronic communication, as defined in the Law on Provision of Electronic Services.

By confirming your subscription to the newsletter, you consent to the Administrator's use of telecommunications terminal equipment for direct marketing of the Administrator's products and services, as well as the transmission of commercial information in accordance with Article 172(1) of the Telecommunications Act. The above consents are voluntary, but necessary for sending the newsletter.

You may withdraw your consent at any time, which will result in the discontinuation of the newsletter as described in this Privacy Policy.

The mailing system used by the Administrator to send newsletters records all activity and actions taken by you in connection with e-mails sent to you, including the date and time of opening the message, clicking on links placed in the message, the moment of unsubscribing, etc.

Webinars, training and newsletter related to this

The Administrator uses GetResponse and Sendgrid services to manage its list of email marketing subscribers and to send emails to subscribers for online training and webinars. GetResponse is a third-party provider that may collect and process your personal data using industry-standard technologies to help the Administrator monitor and improve the newsletter. In connection with the performance of

GetResponse services Administrator uses cookies, unique identifiers, beacons and similar tracking technologies.

The administrator encourages you to read the GetResponse and Sendgrid privacy policies.

Referral links on the blog

Links referring to other websites, including affiliate links approaching from partner networks, may appear on the Portal. They will open in a new browser window or in the same window. The Administrator is not responsible for the content provided by these websites. The Administrator encourages you to read the privacy policy or terms and conditions of these websites each time.

Server logs

Use of the website involves sending queries to the server on which the Portal is hosted. Each inquiry directed to the server is recorded in the server logs, which include, among other things, i.e. the public IP address of the computer from which the inquiry came, the user name provided during the authorization process, the time of the inquiry, information about the user's browser, language, access times and address, the page from which the user was redirected, information about the Internet browser or information system you are using. The data referred to above are not associated with specific individuals using the Portal, but are used only as supporting material for administrative purposes. The Administrator does not use server logs in any way to identify you.

XIV. Changes to Privacy Policy

This Privacy Policy may be amended from time to time. The latest version of the document in question is published on the Portal.

The reason for changes to the document may be due to the development of Internet technology, changes in generally applicable law, changes in the security measures used, the tools or subcontractors used, as well as the development of the Portal. Any changes made by the Administrator to the Privacy Policy in the future will be published and will be effective only for the future. The Administrator recommends reviewing the Privacy Policy each time before taking any action on the Portal or social media.

Date of last update: **01.11.2022** r.