



PRIVACY POLICY APPLICABLE AT WWW.ADVOCU.COM

With a view to ensuring your security and in order to process your personal data – during your use of our services – in a legal, reliable and transparent manner, we hereby adopt this document hereinafter referred to as the Privacy Policy.

The document applies to processing and protection of the Users' personal data in connection with their use of the Website, and it has been drafted by Nexocode.

To protect its Users' personal data, Nexocode applies appropriate organisational and technical measures that prevent interference with the Users' privacy. These measures ensure security on a level prescribed by applicable laws, including:

1. *the Personal Data Protection Act of 10 May 2018,*
2. *the Regulation 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),*
3. *the Electronically Supplied Services Act of 18 July 2002,*
4. *the Act of 16 July 2004 Telecommunications Law.*

The use of the Website is carried out via the secure SSL protocol which protects online data transmission.

I. Glossary

1. **User** – a party that uses the Website, which may involve any of the following: natural persons with full capacity to perform acts in law, legal persons and unincorporated business units with legal capacity assigned by specific legal regulations
2. **Nexocode** – NEXOCODE Sp. z o.o. with registered office in Krakow, ul. Gen. Henryka Kamieńskiego 51, 30-644 Krakow, Poland, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Krakow-Śródmieście in Krakow, XI Commercial Division of the National Court Register, under entry No. KRS: 0000686992, Tax Id. No. (NIP): 6762533324
3. **Website** – the website run by Nexocode under the URL address www.advocu.com whose content is available for authorised individuals.
4. **Cookies** – limited information saved by a server on the User's computer readable for the server at the next connection
5. **SSL protocol** – a special standard of encrypted online data transmission as opposed to standard transmission carried out via open text

6. **System Log** – information sent to a server by the User's computer at each connection potentially containing various data (e.g. IP number) allowing for the determination – with smaller or greater accuracy – from where the connection has been made.
7. **IP address** – an individual number usually held by each computer working online; the IP number can be either permanently linked with the given workstation (static IP) or assigned to it for the given connection (dynamic IP).
8. **GDPR** – the Regulation 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)
9. **Personal Data** – any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name and surname, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
10. **Processing** – any operations performed on the Personal Data, such as collecting, recording, storing, structuring, altering, sharing and erasing, especially the ones performed in any IT systems

II. Cookies

The use of the Website is carried out via the secure SSL protocol which protects online data transmission. In conformity with Art. 173 of the Act of 16 July 2004 Telecommunications Law, the Website uses the Cookies, i.e. IT data, in particular text files, stored on the User's terminal equipment. The Cookies are used to:

- facilitate the use of the Website for the User;
- subsequently recognise the User – in case of re-connection with the Website from the equipment on which they have been saved;
- prepare statistics that help understand how the User uses webpages, which allows for the improvement of the webpages' structure and content;
- customise the Website's content, and optimise the use of the customised webpages.

Usually, the Cookies contain a name of a webpage from which they originate, time for which they are stored in the terminal equipment, and a unique number. As part of the Website, Nexocode uses the following types of the Cookies:

- 'session cookies' – stored in the User's terminal equipment until the User logs off, leaves a webpage or turns off a web browser;
- 'persistent cookies' – stored in the User's terminal equipment for a period specified in the Cookies' parameters or until they are removed by the User;
- 'performance cookies' – allowing for gathering information as to how the Website's webpages are used;

- 'necessary cookies' – allowing for the use of services available as part of the Website;
- 'functionality cookies' – allowing for saving the User's selected settings and for the customisation of the User's interface;
- 'own cookies' – placed by the Website;
- 'external' – originating from a third-party webpage;
- 'Facebook cookies' – more information available at the address <https://www.facebook.com/policies/cookies>;

III. System Logs' Operation on the Website

The Users' activity on the Website, including their personal data, are registered in the System Logs. Information gathered in the Logs is processed predominantly for the purposes related to the provision of the services, i.e.:

- for analytical and statistical purposes – to constantly improve the quality of the services provided as part of the Website and to adjust its functionalities to the Users' needs. In this case, a legal basis for processing involves Nexocode's legitimate interests consisting in analysing the Users' activity and preferences;
- to detect abuse, to identify and counteract any threats to the Website's stability and proper operation.

IV. Cookies' Operation on the Website

The Website uses the basic Cookies that facilitate the use of its resources. The Cookies contain useful information and are stored on the User's computer; Nexocode's server can read them when re-connected with the workstation in question. Most web browsers by default allow for the placement of the Cookies in the User's terminal equipment.

Each User of the Website has an option to change the Cookies-related settings in a web browser's settings:

• Google Chrome

Click menu (in the upper right corner), the 'Settings' tab > 'Show advanced settings'. In the 'Privacy' section, click the 'Content settings' button. In the 'Cookies' section, the following settings pertaining to the Cookies may be changed:

- removing the Cookies,
- blocking the Cookies by default,
- default consent to the Cookies,
- default operation of the Cookies and of web pages' data until the closure of a browser,
- defining exceptions for the Cookies originating from particular websites or domains;

- **Internet Explorer 6.0 & 7.0**

From a browser's menu (right upper corner): Tools > Internet Options > Privacy, the 'Sites' button. The relevant level is determined with a slider, and the change is confirmed with the 'OK' button;

- **Mozilla Firefox**

From a browser's menu: Tools > Options > Privacy. Activate the Firefox programme field: 'will use custom settings'. The Cookies' operation is determined by marking – or not marking – of the 'Accept cookies' box.

- **Opera**

From a browser's menu: Tools > Preferences > Advanced. The Cookies' operation is determined by marking – or not marking – of the 'Accept cookies' box.

- **Safari**

In a Safari drop-down menu, select 'Preferences' and click the 'Security' icon. A relevant security level can be selected here by choosing the 'Accept cookies' option.

If the Users do not want to receive the Cookies, they may change the relevant settings of their browsers. However, if the Cookies necessary for authentication processes, security purposes or for maintaining the User's preferences are turned off, this might hinder, and in extreme cases also prevent, the use of the Website.

V. Personal Data

1. Pursuant to Art. 13 of the General Data Protection Regulation of 27 April 2016 (EU OJ L 119 of 5 April 2016), we hereby inform you that the controller of your Personal Data is NEXOCODE Sp. z o.o. with registered office in Krakow, ul. Gen. Henryka Kamieńskiego 51, 30-644 Krakow, Poland, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Krakow-Śródmieście in Krakow, XI Commercial Division of the National Court Register, under entry No. KRS 0000686992, Tax Id. No. (NIP) 6762533324.
2. The controller can be contacted at the e-mail address: support@advocu.com.
3. Your Personal Data will be processed in order to enable the use of the Website's functionalities and the creation of an account, pursuant to Art. 6.1.a)-b) of the General Data Protection Regulation of 27 April 2016.
4. Your personal data will be processed for marketing purposes, only if you express your separate consent for processing for this purpose.
5. Your Personal Data will be processed for the period of maintaining the account on the Website and subsequent to the deletion thereof; and in order to pursue claims related to the performance of an agreement, to perform obligations prescribed by law, including in particular the tax and accounting ones, to prevent abuse and fraud,

to create statistics and to archive the data for the maximum period of ten years following the deletion of the account.

6. You have the right to request from the controller access to and rectification or erasure of the Personal Data or restriction of processing, as well as the right to data portability, the right to object against processing and the right to withdraw consent.
7. If you detect that your Personal Data are processed in breach of the GDPR, you have the right to file a complaint with the President of the Personal Data Protection Office.
8. The submission of the Personal Data is voluntary; however, if they are not provided, this will result in inability to register on the Website and make an order.
9. Your Personal Data will be transferred outside the European Economic Area to the United States of America based on appropriate safeguards i.e. data protection clauses adopted by the European Commission.
10. Your Personal Data will also be processed by automated means in the form of profiling. The consequences of profiling entail the analysis of the Users' behaviour patterns and preferences, and creation of statistics.
11. The Personal Data collected via forms to which the User has given consent will be processed for the purposes and term necessary for the proper discharge of relevant performance. Details will be specified in applicable information clauses and consent to the processing of the Users' Personal Data placed under particular forms.

VI. Additional Information

1. As part of the Website, external links may be placed that enable the Users direct access to other webpages, or the Cookies from other entities may be additionally placed in the Users' workstations during their use of the Website, in particular from such providers as Google, in order to enable the Users the use of the Website's functionalities integrated with these webpages. Each provider sets rules for the use of the Cookies in its privacy policy; therefore, for security reasons we recommend reading their privacy policies prior to the use of such webpages.
2. We reserve the right to amend the above Privacy Policy by publishing a new Privacy Policy on our Website. Once amended, the Privacy Policy shall be released on the Website with a new date.
3. More information concerning terms of service, in particular rules governing operation of the Website, procedures and terms applicable to the conclusion of agreements, and terms of access to the Website's content and of use of the Website, are presented in the [Rules](#).

Advocu Team