

ULAM LABS Privacy Policy

This Privacy Policy is a document related to the Terms of Service of the Ulam Labs Website (“Terms of Service”). Definitions of the terms used in this Privacy Policy were included in the Terms of Service. The provisions of the Terms of Service are applied accordingly. The Policy is for information purposes and serves satisfaction of information obligations imposed on the data controller under GDPR, i.e. Regulation (EU) 2016/679 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).

1. PERSONAL DATA CONTROLLER

1. The Controller of the personal data provided by the User is Konrad Rotkiewicz conducting a business activity under name Ulam Labs Konrad Rotkiewicz at ul. Powstańców Śląskich, nr 121, lok. 5 (53-332 Wrocław), Tax Identification Number NIP: 5010046816, National Business Registry number REGON: 021880186.
2. You may contact Ulam Labs as the Personal Data Controller in particular via e-mail at: privacy@ulam.io.

2. DATA PROCESSING METHOD

1. The purpose and scope of the processing of Users’ personal data are determined by the scope of consents and data provided by the User sent by means of a relevant form.
2. The processing of Users’ personal data may pertain to e-mail address, IP address, first and last name, phone number, image.
3. Personal data of the Users will be processed for the following purposes:
 1. compliance with obligations resulting from legal provisions—the legal basis is the statutory authorisation to process data necessary to act in line with the law (Article 6.1(c) of the GDPR);
 2. provision of services by electronic means through the Website—the legal basis is the statutory authorization to process data which is necessary to perform an agreement if the data subject is a party to such agreement, or if it is essential for undertaking certain actions prior to conclusion of an agreement upon request of the data subject (Article 6.1(b) of the GDPR);
 3. initiation of promotional and commercial actions carried out by Ulam Labs—the legal basis is a legitimate interest executed by Ulam Labs (Article 6.1(f) of the GDPR) or voluntary consent (Article 6.1(a) of the GDPR);
4. The Website and its elements, including design and content, are protected by copyright or other rights related to intellectual property. Such elements may not be reproduced, distributed or published, as a whole or in part, by the User without consent of Ulam Labs. In particular, the User is not allowed under the Terms of Service to reproduce, disseminate, lend, dispose of or otherwise redistribute the Website elements, directly or indirectly, whether against charge or free of charge, otherwise than through Ulam Labs.
5. Users’ personal data will be processed for the following period:
 1. a period sufficient for Ulam Labs to prove the appropriate performance of its obligations, whereby such term corresponds to the period of limitation of claims;
 2. in the case of marketing actions, until the concerned person objects to further processing of his/her personal data for marketing purposes or until he/she revokes the consent to be sent messages with marketing content.
6. Upon the lapse of the above mentioned period, personal data will be deleted, unless their processing is necessary under another legal basis.
7. In certain situations Ulam Labs may transfer Users’ personal data to third countries (i.e. beyond the

European Economic Area), in particular to the United States of America under the EU-U.S. Privacy Shield. In such a case, Ulam Labs will take every effort to ensure that Users' personal data are appropriately secured and will transfer Users' personal data only to entities which guarantee the appropriate level of protection of data.

3. PROFILING

1. If the User has consented to profiling, Ulam Labs will be entitled to profiling.
2. Profiling is a form of automated processing of personal data that will allow Ulam Labs to assess the User's personal factors, primarily related to User's preferences, interests and needs that result from the User's behavior on the Website in order to adapt the Services to the User's need, and provide the User with content that may of interest, as well as the display of ads that respect his preferences.
3. At any time, the User may object to profiling by writing to the e-mail address: privacy@ulam.io.

4. RECIPIENTS OF DATA

1. Ulam Labs may entrust the processing of Users' personal data to third parties to ensure the functioning of the Website, provision of Services, as well as the exercising of its rights or compliance with its obligations connected with processing. In such a case, data recipients may include: the hosting provider, the provider of the CRM service, the e-mail operator, legal firm.
2. Personal data collected by Ulam Labs may also be disclosed to: competent state bodies upon their request on the basis of relevant provisions of law, or other persons and entities—in the cases prescribed in the provisions of law.
3. Each entity to which Ulam Labs transfers personal data for processing on the basis of a personal data transfer agreement (hereinafter referred to as "Transfer Agreement") guarantees an adequate level of security and confidentiality of the processing of personal data. The entity processing User's personal data on the basis of the Transfer Agreement may process them through another entity only upon prior consent of Ulam Labs.
4. Disclosing personal data to unauthorized entities under this Privacy Policy may only take place upon prior consent of the data subject.
5. If personal data are transferred to entities from third countries for processing, such transfer may take place on the basis of respective model contract clauses or decisions of the European Commission, in particular the EU-U.S. Privacy Shield, i.e. Commission Implementing Decision 2016/1250/EU of 12 July 2016.

5. RIGHTS OF DATA SUBJECT

1. In connection with the processing of data the User has the right to: (a) delete the collected personal data referring to him/her both from the system belonging to Ulam Labs as well as from bases of entities which have co-operated with Ulam Labs, (b) restrict the processing of data, (c) portability of the personal data collected by Ulam Labs and referring to the User, in this to receive them in a structured form, (d) request Ulam Labs to enable him/her access to his/her personal data and to rectify them, (e) object to processing, (f) withdraw the consent towards Ulam Labs at any time without affecting the legality of the processing carried out on the basis of the consent before it is withdrawn, (g) lodge a complaint about Ulam Labs to the supervisory authority (President of the Personal Data Protection Office).

6. OTHER DATA

1. Ulam Labs may store http enquiries, therefore the files containing web server logs may store certain data, including the IP address of the computer sending the enquiry, station name—identification through http protocol, if possible, date and system time of registration on website of Ulam Labs and receipt of the enquiry, number of bytes sent by the server, the URL address of the site visited by the User before if the User has entered the website through a link, information concerning User's browser, information on errors, information on User's device, identifiers of mobile devices (i.e. Apple Advertising Identifier). Web server logs may be collected for the purpose of proper administration of the website. Only persons authorized to administer the IT system have access to data. Files containing web server logs may be analyzed for the purpose of preparing statistics concerning traffic on the website and occurring errors. Summary of such details does not enable identification of any person.

7. SECURITY

1. Ulam Labs applies technological and organisational means in order to secure the processing of personal data adequately to the threats and category of data to be secured, in particular, through technical and organisational means Ulam Labs secures data against being disclosed to unauthorised persons, taken over by an unauthorised person, processed in violation of the law, and changed, lost, damaged or destroyed. The collected Users' personal data are stored on a secured server, moreover, the data are secured by Ulam Labs' internal procedures related to the processing of personal data and information security policy.
2. Ulam Labs has also implemented appropriate technical and organisational means, such as pseudonymisation, designed to effectively enforce the data protection principles, such as data minimisation, and for the purpose of providing the processing with necessary safeguards, so as to meet the GDPR requirements and protect the rights of data subjects.
3. At the same time, Ulam Labs states that using the Internet and services provided by electronic means may pose a threat of malware breaking into User's teleinformatic system and device, as well as any other unauthorised access to User's data, including personal details, by third parties. In order to minimize such threats, the User should use appropriate technical security means, e.g. use updated antivirus programs or programs securing the identification in the Internet. In order to obtain detailed and professional information related to security in the Internet, Ulam Labs recommends taking advice from entities specializing in such IT services.

8. COOKIES AND USER IDENTIFIERS

1. For the purposes of correct operation of the website, Ulam Labs uses a cookie support technology. Cookies are packages of information stored on User's device through the website, usually containing information corresponding to the intended use of a particular file, by means of which the User uses the website www.ulam.io (Website)—these are usually: address of the Internet website, date of publishing, lifetime of a cookie, unique number, and additional information corresponding to the intended use of a particular file.
2. The website uses two types of cookies: (a) session cookies, which are permanently deleted upon closing the session of the browser; (b) permanent cookies, which remain on the device after closing the session until they are deleted.
3. It is not possible to identify the User on the basis of cookie files, whether session or permanent. The cookie mechanism prevents collection of any personal data.
4. The cookies used on the website are safe for User's device, in particular they prevent viruses or other software from breaking into to the device.
5. Files generated directly by Ulam Labs may not be read by other websites. Third-party cookies (i.e. cookies provided by entities co-operating with Ulam Labs) may be read by an external server.
6. The User may individually change the cookie settings at any time, stating the conditions of their storage, through the Internet browser settings or configuration of the service.
7. First of all, the User may disable storing cookies on his/her device in accordance with the instructions of the browser producer, but this may disable certain parts of or the entire operation of the website.
8. The User may also individually remove cookies stored on his/her device at any time in accordance with the instructions of the browser producer.
9. Ulam Labs uses own cookies for the following purposes: configuration of the Website and adjustment of the page content to the preferences or conduct of users; analysis and research of views, click number and path taken on the website to improve the appearance and organisation of content on the website, time spent on the website, number and frequency of visits on the website.
10. Ulam Labs uses third-party cookies for the following purposes:

TOOL:	PURPOSE OF STORING:
Google Analytics	collecting general or anonymous statistical data by means of analytical tools
Google Adwords	promotional and marketing actions within the retargeting process
Apple Search Ads	promotional and marketing actions within the retargeting process in Apple AppStore
Facebook Ads	promotional and marketing actions within the retargeting process

11. Details concerning cookie support are available in the settings of the browser used by the User.

9. FINAL PROVISIONS

1. This Privacy Policy comes into effect on 17.02.2020.