

# Privacy statement

Sp. z o.o. NOVA DIGITAL (hereinafter referred to as Nova Digital) strives to maintain reliable protection for our customers, products and company. Our principles: establish and maintain trusting relationships, reduce risks and simply do the right thing.

Nova Digital is committed to protecting your privacy and providing you with a positive experience when using our websites, products and services (hereinafter referred to as "Solutions").

Please familiarize yourself with [the personal data protecting rules of the Nova Post group of companies](#)

This Privacy Statement applies to websites and Nova Digital Solutions that link to or reference this Privacy Statement. The statement describes our rules for processing personal data, the options available to you to manage the process of collection, use, access to your personal data, as well as how to update and correct it. Please note that additional information about our policies for handling Personal Data in the context of Nova Digital Solutions may be provided for specific solutions in data privacy letters and cards, offer descriptions or other notices displayed before or during data collection. Certain websites and Nova Digital Solutions may have their own privacy statements that describe the specifics of personal data processing for those websites or Solutions. If a specific notice for a website or Solution differs from this Privacy Statement, the specific notice will take precedence. In the event of differences between non-English versions of this Privacy Statement, the English version will take precedence.

## What is personal data?

"Personal Information" is any information that can reasonably be used to identify or otherwise identify an individual, including: name, postal address, email address, telephone number, account login details (such as (i.e. account number and password), account data in social networks or payment card number.

The types of Personal Information we may process depend on the specifics of the business and the purposes for which it was collected. They may contain the following:

- contact information, account/registration information, and online identifiers;
- login credentials where account creation is required;
- communication content (eg audio, video, text);
- financial information (such as bank account details or credit card information);
- detailed information about the individual's business activities and other interests and views (for example, if the information is stored in a customer relationship management database);
- information about the user and the use of our websites and Solutions, including system information such as device identifiers and telemetry (such as IP or MAC address), where such data is associated or linked to a particular device a person

If we associate other data with your personal data, it will also be considered personal data.

## Collection and use of personal data

When you interact with our websites, Solutions or other resources, we may collect certain data about you, including personal data. We also obtain personal data from trusted third-party sources and engage third parties to collect personal data on our behalf in accordance with applicable law.

We may use your personal data for our business operations and to ensure our security, to provide, improve and personalize our websites and Solutions, to send notifications, direct marketing and other communications, and for other purposes permitted by applicable law.

We collect personal data for various business purposes, including:

- customer relationship management and administration;
- order processing, including invoicing and payment;
- return of assets, return and replacement of products;
- creating and managing user accounts;
- populating websites and Solutions and ensuring the use of certain features;
- analyze, personalize, improve accuracy and improve user experience, communications and interactions;
- sending messages (directly from Nova Digital or from our partners), in particular for the purposes of direct marketing or evaluating customer satisfaction;
- management of communication parameters. You can change your communication options at any time.
- execution of the contract, provision of Solutions and customer service
- managing job applications
- administration of online training, testing and certification
- facilitating conferences, webinars and other events
- protection of Nova Digital, our users, websites and Solutions and others

By providing Nova Digital with personal data (such as name, email address, and phone number) of a third party, you warrant that you have the appropriate permission of such third party. In particular, this applies to cases when you forward reference or marketing materials to acquaintances or send offers to fill vacancies. Third parties may opt out of receiving future communications.

In some cases, Nova Digital and involved third parties may automatically collect data through cookies, web logs, web beacons, and other similar means. For more information, see the Use of Cookies and Other Technologies section below.

## **Your privacy rights**

We need your help in maintaining the accuracy and relevance of your personal data. We provide you with opportunities to access, correct, stop using or delete your personal data.

Use your personal account to view or edit your personal data and settings online.

Where Nova Digital acts as a "data controller", in accordance with applicable data protection legislation, you may contact it directly with requests for access to information, rectification, removal, objection and deletion of your profile as described on the website and in documentation of a specific Decision, or send a request to the DPO (officer for the protection of personal data) to e-mail [dpo@novapost.com](mailto:dpo@novapost.com).

When Nova Digital acts as a "data processor" and you wish to exercise your rights of access and request correction, deletion or removal, Nova Digital will direct you to the data controller in accordance with applicable data protection legislation.

If you need further assistance in accessing, correcting, removing or deleting your personal data, please contact us directly. We will respond to your request within 30 days or in accordance with applicable data protection legislation. If we cannot satisfy your request or if we need more time, we will inform you further.

## **Disclosure of your personal data**

Personal data may be processed by third parties for the purpose of carrying out our commercial activities, providing, analyzing, improving, maintaining and personalizing our Solutions and websites, to send marketing and other communications related to our activities, and for other purposes, if they are permitted by applicable law or you have given us your consent to them.

Personal data may be disclosed in the following ways:

- Within the Nova Post group of companies for data processing purposes such as marketing, business operations, compliance, security, website functionality or Solutions or storage.
- To business partners, service providers, authorized third-party representatives or contractors to provide the Website, Solutions, service or transaction at your request. In particular, this applies to the following cases: processing orders and credit card transactions, hosting websites, hosting the registration system for participation in the seminar, sales processes and pre/ post-sales support, ensuring the operation of the support service.
- To Nova Digital's business partners or suppliers, so that they can provide you with information about their products or services, subject to your consent.
- In the context of (or during any negotiations regarding) a merger, sale of company assets, consolidation or restructuring, financing or acquisition of all or part of our business by another company.
- In response to a request for information from an authorized body or third party, if we believe disclosure is appropriate or required under any applicable law, regulation or court order.
- Employees of law enforcement agencies, state authorities or other third parties, if it is necessary to comply with court order or national security requirements, to protect the rights, property or safety of Nova Digital, our business partners, you or other persons, as well as in accordance with other requirements of current legislation.
- In a consolidated form, after anonymization and/or removal of identification data, in a form that practically makes it impossible to identify a person.
- Subject to prior notice and your consent to access.

## **Protection of your personal data**

We take reasonable and appropriate measures to protect the personal data entrusted to us and treat it in accordance with this Privacy Statement. Nova Digital uses physical, technical and organizational security measures designed to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. We also require our suppliers to protect such information from accidental or unauthorized destruction, loss, alteration, unauthorized disclosure or access under the terms of our agreements with them.

## **Storage and elimination of personal data**

We will keep your personal data for as long as necessary to fulfill the purposes for which it was collected. We will retain and use your personal data to the extent necessary to meet business requirements, legal obligations, resolve disputes, protect our assets, and enforce our rights and agreements.

We will not retain personal data in a form that enables the identification of an individual if the purpose for which the personal data was collected has been achieved and there is no legal or commercial need to retain such personal data. In the future, the data will be eliminated, deleted, anonymized and/or removed from our systems.

## **Use of cookies and other technologies**

Nova Digital resources use automatic data collection tools, such as cookies, embedded links, pixels, tags and web beacons. These tools collect certain standard information that your browser sends to us (such as IP address, MAC address, click pattern and telemetry data).

These tools help make your visits to our websites and your use of the Solutions more convenient, efficient and personalized. We also use the information to improve our Websites and Solutions and to provide better services and provide greater performance, to better understand your potential interest in our Websites and Solutions and to provide you with more relevant advertising and other content.

We work with third parties to serve ads on our website and manage the display of our ads on other sites. Our third-party partners may use cookies or other similar technologies to show you advertisements based on your interests and website browsing history. If this type of third-party advertising is disabled, generic non-personalized ads will continue to be displayed.

To update your cookie settings, click the "Cookies" link at the bottom of any page on this website. In addition, you can use other tools to manage cookies and similar technologies. For example, your Internet browser may have controls that restrict the use of cookies by websites you visit.

### **Automated decision making**

We process personal data both automatically and manually. Automated methods are often used in accordance with applicable law to facilitate manual processing. If such automated decision-making may affect an individual's rights and legitimate interests, we provide that individual with the opportunity to inquire about the decision or to request a manual data review. Manual verification may be performed by Nova Digital employees or trusted third-party partners working on behalf of Nova Digital.

### **Links to websites**

We may provide links to other third party websites and services that are not under Nova Digital's control and are governed by the third party's privacy policy and not by this Privacy Statement. We recommend that you review the privacy statements of the websites you visit and the applications you use.

### **Protection of children's privacy**

The company Nova Digital calls on parents and guardians to actively monitor their children's activities on the Internet. Nova Digital does not knowingly collect personal data from children without the appropriate consent of parents or guardians. If you believe that we may have obtained personal data from a person who is under the age of consent under local law, please let us know and we will do our best to investigate and resolve the issue.

### **International transfer, processing and storage of personal data**

Since the Nova Digital organization cooperates with partners around the world, we may transfer your personal data to representatives of the Nova Post group of companies, as well as to third parties and business partners in various jurisdictions, as indicated above. Similarly, access to personal data may be provided in countries where the Nova Digital organization or the Nova Post group of companies operates. If necessary, Nova Digital may transfer your personal data in accordance with approved transfer mechanisms, as well as any applicable local legal requirements.

By using our Websites and Solutions or providing us with any personal data, you consent (to the extent permitted by applicable law) to the transfer, processing and storage of such data outside of your country of residence, where data protection standards may differ.

### **Update of this Application Nova Digital about confidentiality**

We may update this Privacy Statement from time to time. An updated version of the Privacy Statement will be posted here with the date of the changes. If there are material changes to the Privacy Statement, we may provide additional notice in other ways. In particular, we may post notices on our websites or send you notifications. If you continue to use our website after the changes come into force, it means that you accept those changes, agree to them and acknowledge their binding force.

Nova Digital Privacy Statement was updated and became effective on 05.02.2024.

### **Questions, comments and our contacts**

We value your opinion. Please send questions or comments about this Privacy Statement to:

DPO (personal data protection officer)

NOVA DIGITAL Sp. z o.o.

02-274 Warszawa, ul. Mineralna 15

[dpo@novapost.com](mailto:dpo@novapost.com)