

PRIVACY POLICY

Last modified: 11 Jan 2023

VirtusLab cares about the privacy and ensures the security of Personal Data collected by VirtusLab or provided to VirtusLab by the users of www.tetrisly.com (the “**Website**”) or TETRISLY software (the “**Users**”, “**you**” or “**your**” depending on the context), as the case may be. Rules for Personal Data processing are laid down in this Privacy Policy.

This Privacy Policy is to inform you of:

- the Personal Data Controller;
- types of Personal Data processed;
- purposes and legal basis for Personal Data processing;
- measures adopted to protect your Personal Data;
- Personal Data recipients;
- rights available to the Users;
- transfer of your Personal Data to third parties and place of processing;
- updates of this Privacy Policy.

Your Personal Data are always processed in conformity with the applicable laws, including in particular under the Regulation of the European Parliament and the Council 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 (the “**GDPR**”).

Your Personal Data may be also processed in Cookies, in line with rules laid down in the Cookies Policy, which constitutes an integral part of this Privacy Policy.

Who is the Personal Data Controller?

The Controller of your Personal Data is Virtus Lab sp. z o.o. with its registered office in Rzeszów (address: ul. Zofii Nałkowskiej 23, 35-211 Rzeszów, Poland), registered in the Polish Court Register kept by the District Court in Rzeszów, 12th Commercial Division, under KRS [entry number]: 0000349785, NIP [tax id]: 5170312965, REGON [statistical id]: 180526627 (the “**Controller**”, “**we**” or “**us**”, depending on the context).

You may contact the Controller at: dpo@virtuslab.com or otherwise as preferred, including verbally and in writing at the Controller's registered address.

What types of Personal Data may be processed?

Personal Data is information related to an identified or identifiable natural person (the “**Personal Data**”). Depending on the purpose, the Controller may collect the following Personal Data:

- a) email address and message content;
- b) first name, last name, title, address, country of origin;

c) personal data contained in Cookies, as defined in the Cookie Policy.

Providing personal data is voluntary. However, failure to provide Personal Data may result in the inability to use given functionalities of the Website, access to certain content, or in the Controller’s inability to provide services, depending on the context.

What are the purposes, legal basis, and for how long your Personal Data are processed?

Your Personal Data are processed by the Controller for the purposes, under a legal basis and during the retention period indicated in the table below.

Purpose	Legal basis	Retention period
to communicate with you, in particular, to provide the message or query to the Controller upon your demand and receive the reply from the Controller	Controller's legitimate interests in communicating with the User who requests the Controller to provide an answer (Article 6.1 (f) of the GDPR)	until prescription periods for claims under the applicable law expire
to provide you with the marketing or commercial information, distribute Newsletter	<ul style="list-style-type: none"> ▪ voluntary consent of the User to receive solicited commercial information, e.g. Newsletter, offers (Art. 6.1 (a) of the GDPR), or ▪ Controller's legitimate interests in carrying out direct marketing activities (Art. 6.1 (f) of the GDPR) 	until effective objection is raised, the purpose of the processing expires, or the consent is withdrawn
to conclude and perform the License Agreement/EULA	taking steps at the request of data subject prior to entering into contract and performing the License Agreement/EULA (Art. 6.1 (b) of the GDPR)	during the term of the License Agreement/EULA
to settle the fees, issue invoices, bills, or fulfil obligations under tax and accounting regulations, or for archive purposes (these data are processed in case of purchasing the payable license)	processing is necessary to comply with the legal obligation imposed on the Controller (Article 6(1)c of the GDPR)	until prescription periods for tax obligations expire
to comply with Personal Data protection legal requirements,	legal obligation imposed on the Controller	until prescription periods for claims due to the

including development of GDPR documentation	(Article 6.1 (c) of the GDPR)	breach of data protection legislation expire
to determine, pursue and defend possible claims	Controller's legitimate interests in taking actions aimed at protecting its rights in proceedings before the courts or other state authorities (Article 6.1 (f) of the GDPR),	until prescription periods for claims under the applicable law expire
to ensure proper functioning of the Website and to improve our operations, systems, products or services	Controller's legitimate interests in conducting analyses and statistics on the use of particular functionalities of the Website (e.g. Google Analytics cookies, Facebook Pixel) (Article 6.1 (f) of the GDPR)	until effective objection is raised or the purpose of the processing is achieved

What measures are taken to protect your Personal Data?

The Controller protects your Personal Data against unauthorized access, disclosure, change or destruction. In particular, the Controller uses data encryption, physical security measures and verification in IT systems. Further, the Controller uses anti-virus software and firewalls. Your Personal Data may be accessed exclusively by authorized individuals bound by confidentiality and by subcontractors that have entered into a Personal Data sub-processing agreement with the Controller and satisfy security criteria described therein.

What does profiling involve, and are your Personal Data subject to profiling?

Profiling consists of any form of automated processing of Personal Data evaluating the personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning a data subject's work performance, economic situation, health, personal preferences or interests, reliability or behavior, location or movements, where it produces legal effects concerning the data subject or similarly significantly affects the data subject.

We do not carry out any statistical evaluation of your behavior (profiling). In particular there is no automated decision making (see Article 22 section 1 in connection with the Article 4.4 and Article 6.1 (b) of the GDPR).

If, following the Website's development, your Personal Data are to be profiled, the Controller shall inform you thereof, and profiling shall be carried out under relevant regulations. In case of profiling, the Controller shall implement then appropriate measures safeguarding your rights, freedoms and legitimate interests, including ensuring an option of human intervention at the Controller's side and a possibility to express a personal position and challenge a decision.

What are your rights?

You have the right to access, rectify, erase your Personal Data, as well as the right to restrict processing and the right to data portability.

You may object to the processing of the Personal Data, for instance, if the processing is based on the Controller's legitimate interest or if the Controller profiles your data.

If the Personal Data are processed based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing carried out on the basis of the consent given before the withdrawal.

To this effect, you may contact the Controller at: dpo@virtuslab.com. You may also contact the Controller otherwise as preferred, including verbally and in writing at the Controller's registered address. The Controller shall respond to your request to exercise any of the above rights within 1 (one) month of its receipt.

You may also file a complaint about your Personal Data processing to the President of the Office for Personal Data Protection.

Can my Personal Data be transferred to any third parties?

Your Personal Data may be transferred to affiliates and partners of the Controller, Controller's sub-contractors, as well as to a limited number of service providers (processors) that perform processing operations such as hosting services, ticketing, marketing or software tools providers. We may also share your Personal Data with our auditors, attorneys or other advisors bound by the obligation of confidentiality in connection with corporate functions.

These entities process your Personal Data on our instructions only and have implemented appropriate technical and organizational measures to safeguard your Personal Data. Your Personal Data may be accessed exclusively by authorized individuals bound by confidentiality and by subcontractors that have entered into a Personal Data subprocessing agreement with the Controller and satisfy security criteria set forth therein.

We may also disclose your Personal Data to comply with legal requirements, such as in response to a court order. In such an event, we will use all reasonable and lawfully available measures to object to overbroad, unclear or otherwise inappropriate requests for information.

We process your Personal Data on the territory of Poland, European Economic Area (EEA). If your Personal Data are transferred to subsidiaries, partners, service providers or third parties located outside the European Economic Area (EEA) which are not subject to an adequacy decision by the European Commission we will ensure that such recipient offers an adequate level of data protection, for instance by entering into EU Standard Contractual Clauses (SCCs) and implementing additional safeguards in accordance with legal requirements, or we will ask you for your prior individual consent to such international data transfers.

In Poland, you may file a complaint about the Personal Data processing to the President of the Office for Personal Data Protection.

How do we change the Privacy Policy?

The Controller reviews the Privacy Policy on a regular basis and updates it, as necessary. Any changes to this Privacy Policy shall apply to you when published on the Website. It is strongly recommended to check the Website often, referring to the last modification date. If you object to any of the amendments to the Privacy Policy, please stop using the Website and request the Controller to remove your Personal Data.

In case of any doubts, this Privacy Policy shall be read and interpreted in conjunction with the Terms and Conditions of the Website. Any capitalized terms not expressly defined in this Privacy Policy shall have the meaning ascribed to them in the Terms and Conditions.

You may request more details concerning processing of the Personal Data from the Controller at any time and address them to the contact point at the beginning of this document.

COOKIE POLICY

effective as of 1 Dec 2022

This Cookie Policy is to inform you about the purposes of storing and gaining access to Cookies in your terminal device and about options to set terms of storing or gaining access to the Cookies through browser settings or Website configuration. The Website's Controller might store the Cookies in your terminal equipment and have access thereto.

What are Cookies?

Cookies are small text files stored on your computer to remember the flow of information between the Website and your browser. They perform several functions that affect your browsing experience ("**Cookies**"). Each Cookie consists of four essential parts:

- a) website name: the name of the domain or subdomain that sets the Cookie;
- b) Cookie name: the cookie has a name unique to the site that set it;
- c) expiration date: the validity of some Cookies expires upon closing the browser (known as a session Cookie); other Cookies will be automatically deleted only when they reach the expiration date set by the User (known as persistent Cookies);
- d) value, meaning the information in the Website's cookie to "remember" a previous visit.

What is the purpose of the Cookies collection?

Cookies are used to observe your behavior on the Website, so we can make it easier for you to navigate the Website. They are also used to remember your preferences, which can be used to display tailored editorial and advertising content to you. These technologies ensure, among other things, the correct operation of the Website.

In accordance with the accepted practice of most websites, we store HTTP requests directed to our server. It means that we know the public IP addresses from which you browse the information content of our service. The content viewed is identified by URLs. We also know, among other things:

- a) time of arrival of the request;
- b) the time the response was sent;
- c) the URL of the page previously visited by you (referrer link) - in case you have accessed the administrator's site through a link;
- d) information about the browser used.

These data are not associated with specific persons browsing the Controller's sites, including the Website. To ensure the highest possible quality of use of the Website, we occasionally analyze log files to determine which pages are visited most often, which web browsers are used if the Website's structure does not contain errors, etc. By visiting our Website, you remain anonymous until you decide otherwise. We use the information contained in system logs (e.g. IP address) for

technical purposes related to the administration of our servers. Besides, IP addresses are used to collect general, statistical demographic information such as the region from which you connect to the Website.

What type of Cookies are used on the Website?

Necessary/primary cookies – files stored in a browser's memory, which are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously. We use a mechanism to verify a user's cookie consent state.

Session Cookies – files stored in a browser's memory until it is closed, required for the Website's functionalities to operate correctly.

Permanent cookies – files stored in a browser's memory for a specific period. Among other things, they guarantee the proper navigation and layout of the Website. A period for which these files are stored depends on a choice which the User can make in their browser settings. This type of cookie allows for information to be passed to the Website whenever the Website is visited by the User.

Analytics cookies – files stored in a browser's memory for the purposes of website traffic statistics and analytics. The analytics service is provided by Google Inc., as part of Google Analytics, Hotjar Ltd., as part of Hotjar. Information obtained with the use of those tools is not shared with any entities other than Google/Hotjar, and serves only to report the User's interactions on the Website.

Advertising cookies – files stored in a browser's memory in order to match advertising content with the User's behavior on the Website. An advertising service is provided by Facebook, Inc. as part of Facebook Pixel, Google, Inc., as part of Google Ads, LinkedIn Corporation as part of LinkedIn Ads, Twitter, Inc. as part of Twitter Ads. Any information obtained in this manner might be shared with advertisers and partners that cooperate with the Controller.

Automatically generated Cookies summary can be found here:

<https://tetrisly.com/cookie-declaration>

What data are collected from the log files?

In addition to Cookies, the Controller may collect data from so-called logs or log files. The information contained in the logs may include but is not limited to the IP address, type of platform and browser, Internet provider, and the address of the page from which you accessed the Website. The way your computer communicates with the Controller's server is completely secure and invisible to third parties using the Internet. The flow of information on pages containing/downloading personal data is carried out in an encrypted SSL (Secure Socket Layer) connection. The collected data are stored as auxiliary material for the administration of the service. The information contained in them is not disclosed to anyone except those authorized to administer the server and the Controller's network. Statistics may be generated based on the log

files to assist in administration. Aggregate summaries in the form of such statistics do not contain any identifying characteristics of visitors to the Website.

What is the legal basis for the Cookies collection?

The legal basis for the collection of your Personal Data read from the Cookies is Article 6(1)(f) GDPR, permitting the processing of Personal Data to realize a legitimate interest of the data Controller. The aforementioned legitimate purposes for which Personal Data read from Cookies are used include: (i) ensuring proper and safe functioning of the Website for you and your device; (ii) adapting the Website to your individual settings and remembering the data entered by you related to the use of the Website, such as the choice of saving Cookies on your device. Data is also collected to tailor the content of advertisements broadcast on the Website.

How to disable Cookies?

You may opt-out of the collection of Cookies by selecting the appropriate settings of the browser used to connect with the Website. Still, in such cases, using all the functions of the Website may prove difficult or impossible - more information on Chrome, Firefox, Safari, Opera, and Internet Explorer. By default, web browsing software allows you to save Cookies on your terminal device (computer). To block the automatic handling of Cookies in the settings of the web browser or to inform you, each time they are sent to your device, you should make the appropriate changes in the settings of the web browser. Detailed information about the possibility and methods of handling Cookies is available in your software (web browser) settings. However, changing the settings of your browser may result in restrictions on the functioning of the Website and the use of its resources.

How do we change the Privacy Policy?

This Cookie Policy and any changes to it shall apply as of the moment they are published on the Website. It is strongly recommended to check the Website often, referring to the last modification date. If you object to any changes to the Cookie Policy, please stop using the Website and/or remove the Cookies from the terminal device.