

PRIVACY POLICY "ŻABKA FUTURE LAB"

The administrator of the website www.zabkafuturelab.com (the "Website") is Żabka Polska Sp. z o. o. with its registered office in Poznań (61-586), ul. Stanisława Matyi 8, entered in the register of entrepreneurs kept by the District Court Poznań Nowe Miasto and Wilda in Poznań VIII Economic Department of the National Court Register under the number KRS 0000636642, with the share capital of PLN 113,215,000 fully covered, BDO: 000016909, NIP: 522-30-71-241, REGON: 365388398 (the "Company").

Through the Website, the Company organizes the "ŻABKA FUTURE LAB" program ("Żabka Future Lab Program"). The purpose of the Program is for the Organizer to support entities from Poland, other European Union countries or third countries, by enabling them to improve innovative products or services offered on the territory of the Republic of Poland. Application to the Żabka Future Lab takes place through completion by the participants of an application form, made available by the Company.

The administrator of the personal data collected and processed within the framework of the Żabka Future Lab Program, within the meaning of the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons in relation to the processing of personal data and on the free flow of such data and the repeal of Directive 95/46/EC (hereinafter referred to as "GDPR") and the Act of May 10, 2018 on the protection of personal data, is the Company, i.e. Żabka Polska Sp. z o. o. with its registered office in Poznań (61-586), Stanisława Matyi 8 Street, entered in the register of entrepreneurs kept by the District Court Poznań Nowe Miasto and Wilda in Poznań VIII Economic Department of the National Court Register under KRS number 0000636642, with the share capital of PLN 113,215,000 fully covered, BDO: 000016909, NIP: 522-30-71-241, REGON: 365388398 ("Administrator").

This privacy policy ("Privacy Policy") defines the manner in which the Administrator may use the collected personal data of the participants of the Żabka Future Lab Program, including in the scope of accepting applications to participate in this Program and the rules of its conduct, in the manner specified in the content of the rules of the Żabka Future Lab Program, available on the Website, at: www.zabkafuturelab.com.

1. SECURITY OF PERSONAL DATA

The Administrator assures that he makes every effort to collect and process personal data of the participants of the Żabka Future Lab Program ("Participants") with utmost respect for the privacy of persons whose data are processed and with utmost care for the safety of processed personal data, and in particular assures that he has taken appropriate measures provided by law to ensure the safety of personal data. The Administrator declares that he applies technical and organizational measures to ensure the protection of the processed personal data appropriate to the risks and categories of data under protection, and in particular protects the data from being accessed by unauthorized persons, from being taken by an unauthorized person, from being processed in violation of the GDPR, and from being altered, lost, damaged or destroyed.

2. METHOD OF COLLECTION OF PERSONAL DATA

The Administrator collects personal data of Participants, i.e. persons joining the Žabka Future Lab Program using the application form made available through the F6s platform (<https://www.f6s.com/terms>). Persons wishing to participate in the Žabka Future Lab Program voluntarily provide personal data necessary for participation by completing them using the form provided. Personal data will be processed on the basis of:

1. art. 6.1.(a) GDPR, i.e. each consent given by the Participant.
2. Article 6(1)(c) GDPR, i.e. the processing is necessary to fulfill a legal obligation of the Administrator (e.g. obligations imposed on the Administrator by tax law);
3. Article 6(1)(f) GDPR - i.e. the processing is necessary for purposes arising from legitimate interests pursued by the Administrator or by a third party.

The scope of personal data collected by the Administrator is indicated in Section 3 of this Privacy Policy. Provision of data is voluntary, but necessary for the Administrator to conduct the Žabka Future Lab Program. Thus, failure to provide personal data by the Participant, may result in the need to exclude his/her participation in the Žabka Future Lab Program or make it impossible to provide certain benefits related to the Žabka Future Lab Program. In addition, the Administrator automatically collects information about visitors to the Website, as described in the section entitled "Cookies" (Section 8 below).

3. SCOPE OF PERSONAL DATA COLLECTED

Personal data that the Administrator collects as part of the operation of the Website and taking participation in the Žabka Future Lab Program:

1. first and last name;
2. e-mail address;
3. data identifying the company (name/company);
4. taxpayer identification number/KRS (if applicable);
5. mailing address;
6. telephone number.

4. SCOPE OF PERSONAL DATA PROCESSING (PURPOSE)

The Administrator uses the collected personal data for the following purposes:

1. enabling registration for the Žabka Future Lab Program;
2. enabling participation in the Žabka Future Lab Program, including sending information about the next steps, activities, tasks and meetings that the Administrator conducts in connection with the Žabka Future Lab Program;
3. conducting correspondence related to the Žabka Future Lab Program;
4. conducting possible complaint proceedings;
5. marketing;
6. tracking activity for statistical research purposes in order to improve the usefulness and content of the Website;
7. administration of the Website.

5. OUTSOURCING OF PERSONAL DATA

The Administrator uses the services of suppliers, contractors and business partners - these include technical or IT service providers who operate the technical infrastructure needed for active maintenance of the Website, in particular suppliers who host, store and

maintain the Website. The Administrator also uses suppliers and contractors who provide services or support, including, perform consulting or auditing services, or support the Administrator's business operations. The Administrator entrusts data to other entities only if such an obligation arises from the law or is necessary for the performance of a specific service, including in particular the conduct of the Žabka Future Lab Program. The 3 sharing of personal data shall take place in accordance with the principles set forth in the provisions of GDPR.

6. INTERNATIONAL TRANSFER OF PERSONAL DATA

The Administrator does not transfer personal data outside the European Economic Area.

7. DATA STORAGE PERIOD

The Administrator shall store personal data for the time that is necessary for the fulfillment of the purposes for which the data were collected and, after the purpose of the processing has ceased, for the period of time specified by law and necessary for the establishment, investigation or defense of claims (e.g., the period of the statute of limitations for claims), or if the obligation to store them arises from the law (e.g., in the case of the need to store data necessary for financial and tax reporting).

8. COOKIES

When browsing the Website, it may be necessary to store on the disk of your terminal device, information in the form of so-called "cookies" (Cookies). The Website uses two main types of cookies: (1) session files - these are temporary files that are stored on the end device until you leave the Website or turn off the software, and (2) permanent files - these are files stored on the device for a specific period of time or until they are deleted. The Website may use all or some of the following types of cookies:

1. "essential", which enable the use of services available on the Website;
2. "performance", which enable the collection of information about the use of the Website;
3. "functional", which allows you to retain the settings you have selected.

9. PERSONAL DATA RIGHTS

Right of access to personal data - any person whose data is processed may demand to be informed about what personal data the Administrator processes, including receiving a copy of their personal data.

The right to rectification of personal data - any person whose data is processed may request the rectification of data that is inaccurate or the completion of data that is incomplete.

The right to erasure of personal data ("the right to be forgotten") - any person whose data is processed may demand the erasure of all his or her data in certain cases, including the withdrawal of consent to processing (provided that it was the only basis for processing) or when the data was processed unlawfully.

Right to object - any person whose data is being processed may, at any time, request that the processing be stopped for reasons related to his or her particular situation in the case where the data is processed for purposes arising from legitimate interests (e.g. for statistics and analysis). In this case, the Administrator will stop processing personal data unless there are valid legal and legitimate: (1) grounds for processing that override the interests, rights and freedoms of the subject, or (2) grounds for establishing, asserting or defending claims.

The right to restrict the processing of personal data - any person whose data is processed may request that the data be "blocked" (i.e., that processing operations be stopped beyond storage).

The right to portability of personal data - any person whose data is processed may request to receive the data he or she has provided in a structured, commonly used machine-readable format. The person may request to obtain the data or send it directly to another designated controller, if technically possible.

The right to withdraw consent to the processing of personal data - any person whose data is processed on the basis of consent may withdraw that consent; withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before such withdrawal.

The right to object to the processing of personal data - any person whose data is processed on the basis of the legitimate interest of the Administrator may object to such processing on grounds related to that person's particular situation. In addition, in the event of a suspected violation of personal data protection regulations, the user has the right to lodge a complaint with the President of the Office for Personal Data Protection (2 Stawki Street 00-193 Warsaw).

10. CONTACTING THE DATA PROTECTION OFFICER AND CHANGES TO THE PRIVACY POLICY

In matters related to the collection and processing of personal data by the Administrator, you can contact the Administrator at: iod@zabka.pl.

The Administrator reserves the right to update this Privacy Policy. As part of the Website and application to the Żabka Future Lab Program, the Administrator may develop new or offer additional services or functionalities. If the introduction of new or additional services or functionalities will result in a change in the way personal data is collected or processed, the Administrator will inform you of these changes prior to their implementation.