

PRIVACY AND COOKIE POLICY OF THE WEBSITE

<https://noho-one.com>

I. DEFINITIONS

1. **Personal Data Controller** – Noho Investment Spółka z ograniczoną odpowiedzialnością with its registered office in Kraków, ul. Armii Krajowej 25, 30-150 Kraków, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Kraków-Śródmieście in Kraków, XI Economic Division of the National Court Register under KRS number: 0000600768, NIP [TAX IDENTIFICATION NUMBER]: 5252646224, REGON [NATIONAL BUSINESS REGISTRY NUMBER]: 363693536.
2. **Website** – the website maintained by the Administrator at: <https://noho-one.com>
3. **User** – a natural person using the Website,
4. **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, 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.
5. **GDPR** – Regulation (EU) 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).

II. GENERAL PROVISIONS

This Privacy and Cookie Policy informs about the principles concerning the processing of personal data on the Website to the Personal Data Controller and affiliated companies, as well as the use of cookies that may be used or made available during the User's use of the Website.

III. SCOPE AND COLLECTION OF DATA IN CONNECTION WITH THE USER'S USE OF THE WEBSITE

In connection with the User's use of the Website, information is collected about the User's activity on the Website, including data recorded in the form of cookies, extended conversion tags, and server logs.

As a general rule, the data related to the use of cookies does not enable the identification and determination of the user's identity (the Controller only processes statistical, anonymised data).

In the event of consent to data processing by the Controller, the Controller may also process certain information related to the granting of consent, including the version or name of the browser or operating system, the User's IP number, or the type of terminal device through which the User has given consent.

IV. CONTACT WITH THE CONTROLLER

In the event of any questions regarding the processing of personal data by the Controller, you may contact us at the e-email address k.czuprynska@nohoinvestment.com or at the telephone number +48 509 165 606.

V. SCOPE OF THE PROCESSED PERSONAL DATA

When using certain features of the Website, the User may be asked to provide personal data. The scope of mandatory and optional data is determined in each instance according to the needs of the particular service the User intends to use. Data via the Website is collected by the Controller directly from data subjects.

If the User uses the Website for the sole purpose of reading its content, the Controller may collect certain information about the User using cookies or extended conversion, of which the Users are informed each time by the Controller. Information on the cookies used on the Services is contained in sections 11 and 13 of this Privacy Policy.

The provision of data is voluntary but necessary in order to use the functions provided on the Website, including the contact forms. Not accepting the provisions of this Privacy Policy means not being able to use the provided functionalities of the Website, and the User should refrain from submitting personal data using the forms when not accepting the provisions of this Policy.

VI. PURPOSES AND LEGAL BASIS FOR DATA COLLECTION

The Controller will only collect and process the Users' personal data in accordance with the provisions of this Privacy Policy. Any data provided by the User, will be used by the Controller for the sole purpose of:

- for marketing purposes, where the User agrees to receive commercial or marketing communications from the Controller (including newsletter services) and the use of marketing tools – the legal basis for data processing is Article 6(1)(a) of the GDPR;
- provision of customer service and contacting the User, including for the purpose of informing the User of any changes concerning the offer, products and services offered by the Controller - the legal basis for data processing is Article 6(1)(b) or (f) of the GDPR;
- processing of personal data in order to comply with legal obligations – the legal basis for processing is Article 6(1)(c) of the GDPR;
- performance of any contractual obligations towards the Controller's business partners, which is our legitimate interest in processing the data – the legal basis for processing the data is Article 6(1)(f) of the GDPR;
- for analytical, developmental purposes, for the purposes of improvements (including to improve user experience), administration, maintenance, technical

support and security of the Website, which is our legitimate interest in processing the data – the legal basis for processing the data is Article 6(1)(f) of the GDPR;

- the possible establishment, investigation or defence of claims, the enforcement or investigation of potential violations of the Terms and Conditions of Use of the Website or other actual or alleged unlawful activities, the protection of the rights, property or security of the Website, Users, customers and employees of the Controller and other third parties, which constitutes our legitimate interest in processing the data – the legal basis for processing the data is Article 6(1)(f) of the GDPR;
- for the purposes of using the contact forms provided by the Administrator on the Website, including for the purposes of handling enquiries and requests made through the contact channel provided by the User – the legal basis for the processing of the data is Article 6(1)(f) of the GDPR;
- for marketing purposes, including profiling for marketing purposes – the legal basis for the processing is Article 6(1)(f) of the GDPR;
- for marketing purposes, including the presentation of personalised advertising and the use of remarketing – the legal basis for processing is Article 6(1)(a) of the GDPR;
- for marketing purposes, including to direct commercial information to the user and direct marketing of investments carried out by the NOHO group and services offered by group companies and business partners, provided that the user has given their consent for such information to be directed to them – the legal basis for data processing is Article 6(1)(a) of the GDPR;
- for the use of our partners' tools that support the operation of the Website and the use of such tools to enable the functionality of the Website in accordance with section 12 of this policy - the legal basis for the processing of your data is Article 6(1)(f) of the GDPR and, where required by applicable law, Article 6(1)(a) of the GDPR, i.e. the User's consent.

VII. RECIPIENTS OF PERSONAL DATA

The Users' personal data may be transferred by the Controller:

- to other companies belonging to the Controller's capital group and companies cooperating with the Controller, insofar as the provision of such data is necessary in connection with the pursuit of the Controller's interests;
- to persons authorised by the Controller, i.e. employees and associates who need to have access to personal data in order to perform their duties;
- the Users' personal data may be transferred to our partners and to external entities providing services to the Controller and processed by them in order to enable them to perform the services commissioned by the Controller, including IT service providers, entities providing real estate brokerage, administrative, postal or courier services, as well as accounting, marketing and legal services;

- to public authorities or bodies entitled to obtain data on the basis of applicable law, e.g. courts, law enforcement agencies or state institutions, when they make a request, on the basis of the applicable legal basis.

In the event of a data security breach, certain personal data may be subject to disclosure to authorities competent to protect them.

In the event of cooperation with the Controller's partners or third-party suppliers, such third-party providers may be located either within the territory of countries that are members of the EU or outside the European Economic Area (EEA).

Where our partners or suppliers are based outside the EEA, the Controller shall ensure that the transfer of data outside the EEA occurs in accordance with the applicable laws in this regard. The level of data protection in countries outside the EEA may differ from that guaranteed by European law. We may transfer data to our partners outside the EEA in particular on the basis of decisions issued by the European Commission or standard data protection clauses (e.g. when the transfer occurs in connection with the Controller's use of Google Analytics or Microsoft Clarity).

All external parties are obliged to comply with the Controller's guidelines and to implement appropriate technical and organisational measures to protect the Users' personal data. Recipients of data may act as our processors (in which instance they are fully subject to our instructions as to the processing of personal data) or as independent controllers (in which case you should additionally refer to their personal data processing rules).

VIII. RIGHTS OF DATA SUBJECTS

The Service User has the following rights in relation to the personal data processed by the Controller:

- right of access to personal data of the User;
- right to rectify the User's personal data if it is inaccurate or incomplete;
- right to erasure of personal data;
- right to object to processing of the User's personal data. The right to object is available when the processing of data by the Controller is based on the Controller's legitimate interest, e.g. for profiling of data for marketing purposes. Upon receipt of an objection, the Controller will stop processing the data for these purposes unless there are compelling legitimate grounds that override the interests, rights and freedoms of the User or the User's data are necessary for the Controller to possibly establish, assert or defend claims;
- In the event of consent to the processing of personal data, e.g. in the event of subscribing to a newsletter or agreeing to receive commercial information, the User may withdraw their consent to further data processing at any time. The consent can be withdrawn at any time by contacting the Controller at the email address provided in Section 4 of this Privacy Policy. The withdrawal of consent does not affect the lawfulness of the processing performed by the Controller prior to the withdrawal of consent by the User;

- right to the portability of the User's personal data;
- right to restrict the processing of the User's personal data;
- right to lodge a complaint with a supervisory authority.

IX. PERSONAL DATA STORAGE PERIOD

The Controller shall store and process the Users' personal data for the period necessary for the purposes of fulfilling the purposes of the processing indicated in Section 6 of this Privacy Policy or in accordance with mandatory legal provisions, i.e., for example, until the User withdraws their consent or until the completion of the agreement when the parties conclude a contract using the functionality of the Website.

Once the purpose of the processing has been achieved, the Controller will delete or anonymise the personal data and, where the Controller intends to process the data for analytical purposes, the Controller undertakes to use the data to the extent adequate and necessary for the specified purposes of the processing and, in particular, in a manner that prevents the identification and identification of the data subjects (e.g. by using pseudonymisation mechanisms).

X. SECURITY

The Controller shall apply appropriate and adequate technical and organisational measures to ensure an adequate level of security and integrity of the Users' personal data, using proven technological standards to prevent unauthorised access to the Users' personal data or other threats to personal data.

XI. COOKIES AND SERVER LOGS

1. The Website uses cookies for its operation, which are short text information that is stored in the browser.
2. When re-connecting to the Website, the website recognises the device on which the page is opened. Files can be read by the system used by the Controller, as well as by the service providers used in the creation of the Website.
3. Some of the cookies are anonymised, making it impossible to identify the user without additional information.
4. By default, your web browser allows the use of cookies on the devices you use, so the first time you visit the Website, a message will appear asking you to agree to the use of cookies.
5. Cookies used in the operation of the Website perform the following functions:
 - a) session status — cookies carry, among other things, information about how visitors use the Website, e.g. which sub-pages they most frequently view. They also provide the possibility of identifying displayed errors. Cookies for storing the so-called 'session status' therefore help to improve the service and enhance the browsing experience;

- b) creation of statistics — cookies are used to analyse how users use the Website (how many open the website, how long they stay on it, which content is of most interest, etc.). This allows us to continuously improve the Website and adapt its operation to users' preferences.
 - c) advertising purposes — cookies make it possible to display advertisements on our partners' websites or advertisements using our partners' tools (retargeting or remarketing) detailed in point 13 below, including personalised advertising.
 - d) Purposes related to improving the user's experience of the Website — cookies make it possible to track users' sessions and analyse their interactions such as clicks or scrolling. Cookies collect data in an anonymous manner, enabling us to better understand user behaviour and optimise the website.
6. If you do not wish to use cookies when browsing the Website, please change your browser settings as follows:
- a) completely block the automatic handling of cookies, or
 - b) request to be notified each time cookies are placed on your device. The settings can be changed at any time.
7. Disabling or restricting the use of cookies may result in significant difficulties in the use of the Website, e.g. in the form of longer page loading times, restrictions on the use of functionality, etc.
8. Using cookies, it is possible to remember e.g. the favourite flats in our offer by the Website User, we can also determine the source of access to our website (UTM; for the Controller's analytical or statistical purposes), the history of browsed flats in the Controller's offer or the history of website visits, etc.
9. Certain events triggered by persons using the Website and information about them are stored in the form of logging on the server. The data stored in this manner is used exclusively for the proper administration of the Website, to ensure its correct operation and the uninterrupted functioning of its various functionalities.
10. The following information can be saved as server logs:
- a) make and model of the device on which the website is opened;
 - b) hardware identifier;
 - c) type and version of operating system;
 - d) date and time of login,
 - e) IP address of the device.
11. Logs of individual user activities can also be recorded in the form of logins. In this instance, the logs are available in the tools designed to support the various functionalities of the Website.
12. The data indicated in paragraph 9 above are not associated with specific users and their use only covers the activities indicated in paragraph 8 above.

XII. SOCIAL MEDIA plug-ins

The Website uses so-called social plug-ins that redirect users to Administrator's profiles held on social networking sites (Facebook, LinkedIn, Instagram). Using functionalities offered by these plug-ins, Users can go to a page belonging to the Administrator (so-called "Fanpage") in a selected social networking service and read information about the Administrator in services to which they are redirected.

While using the above mentioned plug-ins, data exchange between the User and the given social network or website takes place. However, the Administrator does not process the data collected by administrators of the said services while using the plug-ins. Therefore, the Administrator encourages to read the regulations and privacy policies of these services before using a given plug-in. The use of certain functions of the indicated providers may be associated with the use of cookies of external entities.

Personal data provided voluntarily on Fanpage will be processed by the Administrator in order to manage a given Fanpage, communicate with you, including answering your questions, interact with you, inform you about the Administrator's offer and events, create a Fanpage community on a chosen platform, to which redirection in form of social media plugins. From the moment you click on a given plug-in, your personal data is processed by a given service/social network, and its owner becomes a joint controller of your personal data in accordance with Article 26 of GDPR. With regard to the data you voluntarily provide on social networking sites, you have the rights set out in section VIII of this Policy.

For more information on the technologies used, please refer to the privacy policy of the respective provider:

Facebook: <http://www.facebook.com/policy.php>

LinkedIn: <https://pl.linkedin.com/legal/privacy-policy?>

Instagram: <https://www.facebook.com/help/instagram/155833707900388/>

XIII. OTHER TOOLS USED BY THE CONTROLLER

We use third-party providers for certain functions on our Website. The respective services are mostly optional features, which you have to explicitly select or use (e.g. YouTube or Vimeo services for viewing presentations or videos uploaded by us on these services).

We have contractual agreements with the relevant suppliers for the provision or integration of their services and, as far as we are able, we endeavour to ensure that external suppliers also transparently communicate the extent of their processing of personal data and comply with data protection legislation.

1. SERVICES FROM GOOGLE INC.:

a) Google MAPS

As part of our Website, we use the Google Maps service provided in connection with certain functionalities of the Website (redirection to the location of the Administrator's investments). This constitutes a legitimate interest within the meaning of Article 6 section (1)(f) of the GDPR, which is also the legal basis for the use of Google Maps. This service is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94034, USA ("Google").

In order to use Google Maps service, it may be necessary to store your IP address. This information will, in principle, be transmitted to Google servers in the USA, where it will then be stored. The Website Administrator has no influence on this data transfer.

b) YouTube

Our website integrates videos from YouTube, for the playback of which we use a plug-in of the YouTube service operated by Google (hereinafter: „YouTube“). The operator of the service is Google.

We use YouTube in order to be able to show you videos and thus better inform you about us and our services. The legal basis for the integration of videos is our legitimate interest within the meaning of Article 6 section 1 (f) of GDPR. However, the use of YouTube for the playback of the videos and the associated further data processing is only carried out on the basis of your consent within the meaning of Article 6 section 1 (a) of GDPR;

c) Google Ads

The Google Ads function is a service provided by Google in connection with users of the Website, enabling the Controller to reach persons who have already visited the Website with an appropriately tailored advertising message. This function allows the Controller's offer on their Website to attract Users who have already used it. The Controller hereby informs these persons that are on their website or collects information about them for these functions.

The above-mentioned Google Ads technology (including for retargeting or remarketing purposes) allows relevant advertising to be displayed to users who have previously visited the Website, even after they have left the Website. This requires recognition of Internet users by the service provider, for which Google cookies are used. Google, however, will not process data that allows the identity of the person to whom the ad is directed. The legal basis for the use of the indicated service and cookies is your consent pursuant to Article 6(1)(a) of the GDPR in connection with the controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

More information on Google Ads is available at: <https://support.google.com/google-ads/answer/2549063?hl=pl>

d) Google enhanced conversions

The Google Enhanced Conversions feature is a service provided by Google linked to the use of Google Ads, allowing GoogleAds conversions to be tracked and

conversions to be accurately measured when cookies are not available. By using this feature, conversion taggers can capture anonymised user information collected on the converted page and then match it to Google's logged-in user information. This allows the Controller to better manage ongoing Google Ads campaigns. Enhanced conversions send encrypted user data to the system: email address and telephone number. The data is not visible to anyone and is stored in encrypted form in the database.

The use of the personal data collected via this processing technology for marketing purposes, in particular for the analysis of the effectiveness of marketing activities, only occurs on condition that the User has given their consent to the use of their personal data. The legal basis for the use of the indicated service and cookies is your consent pursuant to Article 6(1)(a) of the GDPR in connection with the controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

More information on the Google Enhanced Conversion Service is available at: <https://support.google.com/adspolicy/answer/7475709?sjid=8202092423848286538-EU>

e) Google Ads offline conversions

The offline conversion function of Google Ads is a service provided by Google linked to the use of Google Ads, allowing the collation of user interactions with the website and ads and offline activities, and measuring the effectiveness of marketing activities undertaken in relation to offline customer interactions. By using this function, we can match the information about the users they have used on the website and the forms available on it with subsequent offline sales activities, allowing us to better manage Google Ads campaigns. Offline conversions send encrypted user data to the controller's system: email address, phone number. The data is not visible to anyone and is stored in encrypted form in the database.

The use of the personal data collected via this processing technology for marketing purposes, in particular for the analysis of the effectiveness of marketing activities, only occurs on condition that the User has given their consent to the use of their personal data. The legal basis for the use of the indicated service and cookies is your consent pursuant to Article 6(1)(a) of the GDPR in connection with the controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

More information on the Google Enhanced Conversion Service is available at: <https://support.google.com/google-ads/answer/2998031>

f) Google Analytics

Google Analytics uses its own cookies primarily to report on user interaction with the Website. Cookies are used in the instance of this service for the Controller's analytical and statistical purposes (information about User activity and use of the Website).

Google Analytics also supports an optional browser add-on that, when installed and activated, disables Google Analytics measurements on all pages viewed by the user: <https://tools.google.com/dlpage/gaoptout/>.

In some instances, data collected using the aforementioned tool may constitute personal data, i.e. information such as pseudonymised cookie identifiers, pseudonymised ad display identifiers, IP addresses, other pseudonymised user identifiers. Google Analytics collects IP addresses to ensure safe use of the service and to inform website owners which countries, regions and cities users come from ("geolocalisation by IP").

The legal basis for the use of the indicated service towards you is consent in accordance with Article 6(1)(a) of the GDPR in connection with the controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

More information about the service is available at: <https://support.google.com/analytics/answer/6004245#zippy=%2Cpliki-cookie-i-identyfikatory-google-analytics>.

g) Google ReCaptcha

In order to protect against abuse of our web forms or the sending of unsolicited information (spam), we may use Google's reCAPTCHA service within certain forms on this website. This service prevents automated software (so-called bots) from conducting fraudulent activities on the Website. The service consists of sending Google the IP address and other data required by Google for the reCAPTCHA service. In accordance with Article 6(1)(f) of the GDPR, this serves to protect our legitimate interests in protecting our Website.

More about the privacy policy for the tools used on the Controller's Website from Google: <https://policies.google.com/privacy?hl=pl>.

h) Google Search Console

The website uses the Google Search Console tool to analyse website statistics, conduct remarketing activities and manage ads linked to the website.

The service uses statistical data from the website derived, among other things, from the cookies referred to in point e above concerning Google Analytics. The service used allows the data processed in Google Analytics to be analysed, including data that may constitute personal data to the extent described in point e above.

The service allows to manage the positioning of the Website in the search engine, monitor traffic and the overall performance of the Website, including errors in its code. The Controller also uses Google Search Console to optimise the performance of the Website in terms of its positioning, to plan strategies for the use and promotion of key phrases, or to obtain information about problems with the server, malware or problems with the accessibility of the Website or its visual perception.

The legal basis for the use of the indicated service towards you is consent in accordance with Article 6(1)(a) of the GDPR in connection with the controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

More information about the service is available at:
<https://policies.google.com/privacy?hl=pl>

2. FACEBOOK ANALYTICS/ADVERTISING SERVICES

The Administrator may use tools on its Website that enable it to display personalized advertising on Facebook, i.e. the company Meta Platforms, Inc. 1601 Willow Rd Menlo Park, CA, 94025-1452, USA.

Advertisements will be presented only to users who have an account with the social network "Facebook", and the data of Website Users will be processed only to recognize the User in order to present him/her with a customized advertising message using cookies, but will not allow to determine the identity of the User. The Administrator does not combine the data used for retargeting or remarketing with any other data. In addition to advertising purposes, tools from Facebook such as the "Facebook Pixel Tag" may also be used for analytical and statistical purposes. The legal basis for the use of the "Facebook" service and cookies from this provider is your consent in accordance with Article 6 section 1 (a) of GDPR in connection with the justified interest of the administrator, i.e. Article 6, section 1 (a) of GDPR;

More about the privacy rules for tools from Facebook:
<https://www.facebook.com/privacy/explanation> .

3. HOTJAR

In addition, we use Hotjar for statistical analyses. Hotjar is a web analytics service provided by Hotjar Ltd, Level 2, St Julians Business Centre 3, Elia Zammit Street, 3155 St Julians STJ, Malta ("Hotjar"). Hotjar uses cookies to enable analysis of user use of the website. The information generated by cookies about your use of the Website is usually transmitted to and stored by Hotjar on servers in Ireland. Hotjar does not process the entirety of your IP address, however, if you do not wish Hotjar to collect data, you can deactivate this option here: <https://www.hotjar.com/legal/compliance/opt-out>. The legal basis for the processing of your data is your consent in accordance with Article 6(1)(a) of the GDPR in connection with the Controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

For more information, see <https://www.hotjar.com/legal/policies/privacy> or <https://www.hotjar.com/legal/compliance/gdpr-commitment>.

4. Microsoft Clarity

For the purpose of optimising and improving the User's experience of the Website, including customisation, we use the Microsoft Clarity tool, which is a

service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-7329 USA. Microsoft Clarity records every visitor to the site, allowing a video of their movement around the site to be played and generating so-called heat maps, indicating the places and elements of the Website of greatest interest to its users. Microsoft Clarity does not record the process of filling in forms for the transfer of personal data. A special Microsoft Clarity tracking code is implemented on the Website, which uses cookies from Microsoft Corporation. The information collected as part of these files is stored by Microsoft in a pseudonymous user profile - these types of profiles do not contain personal data. Neither Microsoft nor the website owners use this information to identify users.

The legal basis for the processing of your data is your consent in accordance with Article 6(1)(a) of the GDPR in connection with the Controller's legitimate interest, i.e. Article 6(1)(f) of the GDPR.

For more information see: <https://learn.microsoft.com/en-us/clarity/faq> and <https://www.microsoft.com/pl-pl/privacy/privacystatement>

5. Microsoft Ads

The Personal Data Administrator on the Website uses the Universal Event Tracking (UET) pixel from Microsoft Ads, a service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-7329, USA. This tool enables tracking of conversions from advertising campaigns conducted in Microsoft Ads, creating audience groups for ad personalization, and optimizing campaign performance.

The legal basis for data processing is your consent in accordance with Article 6(1)(a) of the GDPR in conjunction with the legitimate interest of the Administrator, as per Article 6(1)(f) of the GDPR.

Data collected through this tool is processed in accordance with Microsoft's [Privacy Statement](https://www.microsoft.com/pl-pl/privacy/privacystatement) <https://www.microsoft.com/pl-pl/privacy/privacystatement>.

6. TikTok Ads

The Website uses the TikTok Ads pixel, for which the responsible entity for users from the European Economic Area is TikTok Technology Limited, The Sorting Office, Ropemaker Place, Dublin 2, Dublin, D02 HD23, Ireland. This solution allows tracking of user actions after clicking on a TikTok ad, building remarketing groups, and optimizing campaigns for better performance.

The legal basis for data processing is your consent in accordance with Article 6(1)(a) of the GDPR in conjunction with the legitimate interest of the Administrator, as per Article 6(1)(f) of the GDPR.

Data collected through this tool is processed in accordance with TikTok's [Privacy Policy](#).

7. LinkedIn Ads

The Website also uses the LinkedIn Insight Tag, for which the responsible entity for users from the European Economic Area is LinkedIn Ireland Unlimited Company, based at Wilton Place, Dublin 2, Ireland. LinkedIn Ads allow for the analysis of campaign effectiveness on LinkedIn, tracking conversions and user actions, and building audience groups based on activity on the Website.

The legal basis for data processing is your consent in accordance with Article 6(1)(a) of the GDPR in conjunction with the legitimate interest of the Administrator, as per Article 6(1)(f) of the GDPR.

Data collected through this tool is processed in accordance with LinkedIn's [Privacy Policy](#).

XIV. PROFILING

The data provided by Users on the Controller's websites will not be subject to automated decision-making, but the Controller stipulates that User data may be profiled for marketing purposes and to improve the User's experience of using the Website, including in particular its usability, navigation, graphic design, responsiveness, page loading, accessibility and content.

XV. FINAL PROVISIONS

1. To the extent not covered by this Policy, the relevant generally applicable provisions shall apply, in particular the GDPR and the Electronic Communications Law of 12 July 2024.
2. The User will be informed of any changes made to this Policy by the publication of the new text of the Policy on the Website and by the display of a message when accessing the Website.
3. This Policy is effective from 17.02.2025.