

SINTERIT PRIVACY POLICY

§ 1 General provisions

1. The purpose of this Privacy Policy is to inform you how we process personal data (including but not limited to: what kinds of data Sinterit collects, under what legal basis and for what purposes, and how long the Company stores them), and what rights personal data subjects have in relation to this processing.
2. This Privacy Policy is addressed to our customers, potential customers, visitors to the Website, persons using our contact form or e-mailing us, persons receiving newsletter from the Company, persons who participate in our webinars and other events as well as any other persons who may be in contact with us or have any relationship with us that entails personal data processing.
3. In the **Appendix no. 1** you may find detailed information about purposes of the processing of personal data, legal bases for the processing as well as retention periods. Please be informed that processing of personal data in some of our internal processes (e.g. tax clearing or payroll) may be regulated in documents other than this Policy. If you did not find information about processing of your data you are interested in, please contact: data@sinterit.com.
4. In the **Appendices no. 2 and 3** you may find detailed information about recipients or potential recipients of your personal data.
5. In the **Appendix no 4** you may find detailed information about cookies and similar technologies that we and our partners use or may use.

§ 2 Glossary

1. 'Company' or 'Sinterit' or "we" means Sinterit sp. z o. o. with its legal seat in Cracow (30-741), at Nad Drwiną 10 street, building B-3, entered into register of businesses hold by District Court for Kraków-Śródmieście, 11th Commercial Division under number 535095, Tax Identification Number (NIP): 6793106416;
2. 'data subject' means a person whom the personal data regards;
3. 'GDPR' means 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);
4. 'personal data' means 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. 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,

consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

6. 'Website' means Sinterit website sinterit.com, where Sinterit informs about its business activity and contacts potential customers.

§ 3 Provision of personal data

1. Provision of any personal data is in most cases voluntary, however, it may sometimes be necessary and therefore refusal to provide data may result in either lack of response expected by you from the Company or lack of the effect you would like to achieve. In other words, refusal to provide us with your personal data may often lead to a situation where we are unable to answer your question or request, conclude an agreement with you, provide you with our products or services, send you our newsletter or consider your application in our recruitment processes.
2. Once an agreement is concluded between you and Sinterit, provision of personal data may be your statutory or contractual obligation, e.g. to ensure proper performance of the contract or make us able to comply with the applicable tax, accounting or customs laws.

§ 4 Sources of personal data

1. We usually obtain your personal data directly from you.
2. Sometimes we can obtain your personal data from third parties, including but not limited to:
 - 1) our distributors
 - 2) our suppliers or
 - 3) companies that provide us with marketing services, e.g. Snov.io.

§ 5 Personal data controller

1. In each case where we decide about purposes and methods of data processing, we are the Controller of the given personal data.
2. You may contact us with regard to your personal data by email: data@sinterit.com.
3. Sometimes we make it possible for you - e.g. by clicking on links or plug-ins placed on our Website - to visit other websites or use other applications that may be administered by different entities. In such cases processing of personal data may take place on the terms established by these entities. You should always read the regulations and privacy policies of them to make an informed decision whether to use a given service or not.
4. Some third parties may also be separate data controllers and process your data obtained from us during or in connection with your visit to our Website, based on your consent for cookies and on the *legitimate interest* premise resulting from art. 6(1)(f) GDPR.

§ 6 Purposes of personal data processing and legal bases of processing

1. Sinterit may process your personal data for many different purposes when it is either required or allowed by the applicable law or when you give consent for the processing, including but not limited to the purposes listed in the column "Purposes of the processing" in the Appendix no. 1.

2. Sinterit may process your personal data based on any basis provided for by the applicable law, such as:
 - 1) your consent for the processing of personal data;
 - 2) necessity of the processing for the performance of a contract;
 - 3) necessity of the processing for compliance with a legal obligation to which the Company is subject;
 - 4) necessity of the processing in order to protect the vital interests of the data subject or of another natural person;
 - 5) necessity of the processing for the purposes of the legitimate interests pursued by the Company or by a third party.
3. You may find detailed information about the legal basis of the processing of personal data in given situations in the column “Legal basis of the processing” in the Appendix no. 1.

§ 7 Legitimate interest to process personal data

We may pursue the following interests based on art. 6(1)(f) GDPR (legitimate interest basis):

1. organising and conducting webinars, competitions and other events to promote the Company, as well as performing our obligations resulting from those events;
2. direct marketing of our products and services;
3. conducting marketing, statistical and analytical actions through our Website;
4. having accounts in social media;
5. conducting recruitment processes in cases no other legal basis such as the Polish Labour Code or consent applies;
6. conducting business communication in cases where no other legal basis such as consent or necessity to perform a contract applies;
7. controlling that only authorised persons have access to the Sinterit Studio Advanced version;
8. administration, archiving and backup of documents;
9. pursuing claims and defending against claims, including but not limited to in connection with complaint processes, debt collection, conducting or participating in court, arbitration or mediation proceedings.

§ 8 Retention of your personal data

1. Your personal data will be processed for as long as it is necessary to achieve a purpose of the processing, subject to the following clauses.
2. If the processing of your personal data is based on your consent, your personal data will be processed until you withdraw your consent to the processing.
3. If the processing of your personal data is based on our legitimate interests, the data will be processed:
 - 1) until you effectively object to the processing, and after that only to:
 - 2) pursue claims and defend against claims, including but not limited to in connection with complaint processes, debt collection, conducting or participating in court, arbitration or mediation proceedings - until the potential claims related to the prior processing are time-barred, or
 - 3) to execute our rights resulting from the applicable law, for so long as this law permits.

4. For more detailed information, please see the column “Retention period” in the Appendix no. 1 below.

§ 9 Recipients of your personal data

1. We may transfer your personal data to our service providers which means persons or entities that provide us with different kinds of services such as IT, telecommunication, marketing, sales, legal, tax, accounting, payroll, customs clearance, banking, postal or transport services.
2. We may transfer your data to tax, accounting, social contributions or customs offices, authorities and courts, if it is required by the applicable law (e.g. for the purpose of tax or customs clearance or controlling) or if it is necessary in court or administrative proceedings.
3. We may transfer your data to our partners, including but not limited to our distributors.
4. We may also transfer your data to social media operators or providers of marketing or analytical services, e.g. if they collect some of your personal data due to their plug-ins or cookies located on our Website.
5. Recipients of your personal data may be either our processors that process the data on our behalf and under our direction, or separate controllers who independently define purposes and ways of the processing
6. You may find more information about recipients or potential recipients of your personal data in Appendices no. 2 and 3.

§ 10 Transfer outside European Economic Area (“EEA”)

1. Your personal data may be transferred outside the European Economic Area (e.g. in connection with our use of the software or services provided by entities operating there). In case of transferring data to other entities outside the EEA, we are obliged to ensure that:
 - 1) the relevant safeguards required by the GDPR are met such as the existence of a specific European Commission’s adequacy decision or usage of standard contractual clauses or
 - 2) We obtain your consent for data transfer outside the EEA.
2. When you consent to cookies on our Website, you accept that your personal data may be transferred outside the EEA. The need to transfer data outside the EEA is mainly due to the fact that some of our service providers have their headquarters or technical infrastructure outside the EEA.
3. You can request additional information regarding your personal data by contacting us by e-mail to the following address: dane@sinterit.com.

§ 11 Your rights

1. You have the right to request from the Company access to and rectification or erasure of your personal data or restriction of processing concerning your personal data and to object to processing as well as the right to data portability.
2. You have the right to withdraw your consent for processing of your personal data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

3. You have the right to lodge a complaint with the President of the Office for Personal Data Protection or other authority that is competent according to the applicable laws.

§ 12 Automated decision-making and profiling

1. We do not use automated decision-making within the meaning of article 22 GDPR. Should such a method be necessary for a provision of specific services in individual cases, you will be informed separately and you will be asked for consent, if such consent is required by law.
2. We use profiling of personal data to track your activity at our Website as well as to track whether and how you are interested in other content we may provide you with. It lets us customise our Website and our offer to your needs and interests. We think that processing of personal data in this way would not involve increased risk for your privacy.

§ 13 Final provisions

1. In matters not regulated in this Privacy Policy the relevant provisions of GDPR and Polish laws shall apply.
2. Sinterit may change this Privacy Policy or Appendices at any time without notice.
3. The changes described above take effect once the amended Privacy Policy or any of the Appendices is published on the Website.
4. We will inform you about the updates by posting information at the Website.

APPENDIX NO. 1 - PURPOSES OF THE PROCESSING OF PERSONAL DATA, LEGAL BASES OF THE PROCESSING AND RETENTION PERIODS

Purpose of the processing	Legal basis of the processing	Retention period
<p>to conduct business correspondence (both in paper and electronically) or talks (including but not limited to conversations conducted in the form of teleconferences), in particular to reply to messages sent via contact form, chat, email or social media or to take actions aimed at concluding a contract or solve an issue</p>	<p>art. 6(1)(a), (b), (c) or (f) GDPR - consent for the processing or necessity for the performance of contract or necessity to perform legal obligations or our legitimate interest in the possibility of conducting business contacts</p>	<p>until you withdraw your consent or effectively object to the processing or we fulfil our obligations under the applicable law or as long as necessary to:</p> <ul style="list-style-type: none"> - reply to your message - if you asked us a question or approached with other business matters, - conclude a contract - if it was the purpose of our correspondence or talks, - fulfil our legal obligations - if we conduct correspondence regarding official matters, e.g. with a public body or another authority, - finalise our correspondence or talks in other situations
<p>to perform agreements concluded by us with distributors, end-users, suppliers, contractors and other third parties; also to handle complaints and solve technical problems</p>	<p>art. 6(1)(b) GDPR - necessity for the performance of contract</p>	<ul style="list-style-type: none"> - until the performance of the specific agreement, e.g. in case of sales agreement regarding Sinterit products - until the buyer picks up the goods from us or until we deliver the goods - until the closure of complaint procedure or till the technical problem is solved

<p>to inform you about updates, conference announcements, use-cases, trade fairs, and other information from Sinterit via our newsletter</p>	<p>art. 6(1)(a) GDPR - consent for the processing</p>	<p>until you withdraw your consent for the newsletter</p>
<p>to conduct, through our Website, marketing, analytical and statistical actions, including but not limited to:</p> <ol style="list-style-type: none"> 1) Website traffic tracking that does not significantly interfere with your privacy or 2) Website traffic tracking that may be more complex and include profiling 	<p>art. 6(1)(a) or (f) GDPR - consent to the processing or our legitimate interest in:</p> <ul style="list-style-type: none"> - broadening our knowledge about the visitors interest in our offer, content on the Website and other content provided by the Company as well as - optimization of our offer and content 	<p>until you withdraw your consent to the processing or until you effectively object to the processing - you may do it by changing the privacy settings in your browser</p>
<p>to have social media presence for the purpose of:</p> <ul style="list-style-type: none"> - increasing our recognition and strengthen Sinterit brand, - increasing the reach of our communication with customers, potential customers, employees and job applicants 	<p>art. 6(1)(f) GDPR - our legitimate interest in marketing, promotional, informational and communicational activities of the Company</p>	<p>until you effectively object to the processing</p>
<p>to conduct other marketing actions, mainly to contact our customers or potential customers for the purpose of direct marketing through email or phone</p>	<p>art. 6(1)(a) or (f) GDPR - consent to the processing or legitimate interest in:</p> <ul style="list-style-type: none"> - presenting Sinterit offer, - broadening our knowledge about the visitors interest in our offer, content on the Website and other content provided by the Company, and/or 	<p>until you withdraw your consent to the processing or effectively object to the processing</p>

	- optimization of our offer	
to provide you with our e-books and other brochures and materials	art. 6(1)(a) or (f) GDPR - consent to the processing	until delivery of the given brochure or materials or until withdrawal of the consent, whatever occurs first
to provide you with access to Sinterit Studio Advanced version	art. 6(1)(b) or (f) GDPR - necessity for the performance of contract or our legitimate interest in verifying that only authorised customers have access to the paid version of Sinterit Studio	until you have been provided with access to the Sinterit Studio Advanced, and then there is a need to process the data as long as the person can use it
to allow you to participate in our webinars, competitions and similar events	art. 6(1)(a), (b) or (f) GDPR - consent to the processing or necessity for the performance of contract or our legitimate interest in organising and conducting webinars, competitions and other events promoting Sinterit	until you withdraw your consent or effectively object to the processing of your data, or until the given webinar, competition or similar event has been completed and all obligations resulting from it or connected with it has been fulfilled, depending what happens first
to conduct recruitment processes	art. 6(1)(b) and (c) GDPR and art. 22 ¹ § 1 and 2 of the Polish Labour Code - processing of the personal data is required by the applicable law and necessary in order to take steps at the request of the data subject prior to entering into a contract. In case you provide us with more information than the applicable law requires, also art. 6(1)(a) GDPR - your consent to the processing or art. 6(1)(f) GDPR - our legitimate interest to ask for information about financial	until the given recruitment has been completed; if you agree to the processing of your data for the purpose of the future recruitments - until you withdraw your consent; if we process your additional data based on your consent - until you withdraw it; if we process your additional data based on our the legitimate interest - until you effectively object to the processing

	expectations or date when a candidate may start working	
to fulfil our legal obligations, including but not limited to obligations related to the concluded agreements or contracts to be concluded (e.g. tax or customs clearance, verification whether the potential buyer of our product is not a subject to sanctions under the applicable law) or other obligations under specific provisions of the applicable law	art. 6(1)(c) GDPR - necessity of the processing for compliance with a legal obligation which the Company is subject to	5 years starting from the end of the calendar year, in which the deadline for the tax or customs payment passed; in other situations for so long as specific provisions of the applicable law require
to pursue claims and defend against claims, including but not limited to in connection with complaint processes, debt collection, conducting or participating in court, arbitration or mediation proceedings	art. 6(1)(f) GDPR - our legitimate interest in securing our rights and defence against claims	until the last day of the year following the lapse of: <ul style="list-style-type: none"> - 2 years from the conclusion of sales agreement in case of B2B contracts, - 6 years from the conclusion of sales agreement in case of B2C contracts, - a period stipulated in the applicable law - in other cases.

APPENDIX NO. 2 - RECIPIENTS OF PERSONAL DATA

Category of recipients or potential recipients of personal data	Why this category of recipients may receive your personal data	Where you can find information about the processing of personal data by the specific recipient
<p>service providers - e.g. IT, telecommunication, marketing, sales, legal, tax, accounting, payroll, customs clearance, banking, postal or transport services</p>	<p>To properly perform their services for Sinterit and make us able to, as the case may be, response to your question, conclude an agreement with you, execute an order and provide you with our products or services, send you newsletter, brochures and e-books, fulfil our legal obligations regarding tax, accounting, customs and other, allow you to participate in our webinars and other events or teleconferences, allow us to conduct our business activity.</p>	<p>You can request additional information regarding your personal data by contacting us by email: dane@sinterit.com</p>
<p>public offices, courts, other authorities - e.g. tax offices, social contributions office, customs offices, courts adjudicating claims for payment, public bailiffs, auditors.</p>	<p>To properly fulfil our obligations resulting from the applicable law.</p>	<p>You can request additional information regarding your personal data by contacting us by email: dane@sinterit.com. We will inform you whether we transferred your personal data to any office, court or other authority and may advise you to approach the appropriate office, court or other authority for details.</p>
<p>partners - distributors of Sinterit products and services - the list of our distributors is on our Website: https://sinterit.com/where-to-buy/.</p>	<p>Based on your consent, if you agreed to the transfer of your personal data to our partners. The purpose of that may be to make our partner, who resides close to you, able to contact you, respond to your</p>	<p>You can request additional information regarding your personal data by contacting us by email: dane@sinterit.com. You may also contact the distributor operating in your country.</p>

	<p>questions, send you newsletter or other informational or marketing materials, prepare an offer for you, conclude an agreement with you and execute it, and provide you with technical support.</p>	
<p>social media as well as providers of marketing or analytical services, both collecting data through cookies on Sinterit website or similar technologies</p>	<p>You consent to our cookies if you continue to use our Website. We also have different social media plug-ins on our Website. We may share information about your use of our Website with social media providers as well as with providers of advertising and analytics services. They may combine it with other information that you've provided to them or that they've collected from your use of their services.</p>	<p>You may find more detailed information about processing of your personal data by the specific recipients included in this category in the Appendix no. 3 - Social Media and in the Appendix no. 4 - Cookies Policy.</p>

APPENDIX NO. 3 - SOCIAL MEDIA

We have profiles on social media (“platforms” or “social media” or “SM”) such as Facebook, LinkedIn and Youtube. In the future we may also be present on other platforms.

We embed social media tracking codes on our Website. It allows:

- us to collect data about the users' demographics and come back with the marketing communications,
- you to visit our social media profiles directly from the Website.

When you access our social media profile, the IP address assigned to your terminal device is transmitted to the platform operator. If you are currently logged on to the platform operator as a user, a cookie with an individual identifier is stored on your terminal device. This enables the platform operator to understand that you have visited this site and how you have used it.

Through the plug-ins of the social media integrated into websites, SM may record your visits to these websites and assign them to your profile on the platform. This may lead to profiling and behavioural advertising or tailored content being offered to you. If you want to avoid this, you should log out from the platform operator or deactivate the "stay logged in" function, delete the cookies on your device, close your browser and restart it. After a possible renewed registration, you will again be recognisable as a specific user by the social media operator.

Our social media presence may be operated under joint control with the operator of the given platform or those operators may be independent controllers.

However please be aware that sometimes social media operators may act as our processors.

In other situations they can be separate controllers, who determine their own purposes of personal data processing as well as the methods and means of the processing.

We have no full knowledge of personal data processing carried out by the SM operators.

If you want to know for sure how the platform operator uses the data connected with your visit for its own purposes, to what extent activities connected with our social media presence are assigned to individual users, how long the social media operator stores this data and whether data from a visit to our social media presence is passed on to third parties - you are advised to read Facebook, LinkedIn, Youtube or others respective privacy policies.

We link some of them in the Appendix no. 4 below.

Please note that third parties may change their terms of service at any time.

APPENDIX NO. 4 - COOKIES AND SIMILAR TECHNOLOGIES POLICY

What are Cookies and similar technologies

Cookies files are small fragments of the content, entered to user's web browser and reentered during further website access. Cookies files are kept at the user's final device (which may e.g. be laptop, tablet or mobile phone) and related browser.

Tracking links and similar technologies also allow to track the behaviour of visitors to the Website or of other content shared by the Company.

We may use Cookies, tracking links and other similar technologies when you visit our Website or open our content.

Third parties such as e.g. our marketing partners or social media operators whose plug-ins we have on our Website may also use Cookies, tracking links and other similar technologies.

What Cookies and similar technologies may be used for

Cookies and similar technologies are used for many different purposes, and we may use them e.g.:

- 1) to adapt the website to the user's preferences,
- 2) to optimise of the use of Website,
- 3) to facilitate logging in to the Website,
- 4) to monitor traffic on the Website and to collect analytical and statistical data, in order to assess the interest of users in our offer and the content we provide,
- 5) to profile users,
- 6) to use behavioural advertising.

Third parties

The use of Cookies and similar third party technologies on our Website or in connection with the services offered is governed by the privacy and/or cookie policies of the third parties that generate such Cookies or similar technologies.

How Cookies are installed and how you can turn them off

When you visit our Website for the first time the cookie banner pops up and you consent to the given cookies or not.

You also have a possibility to change settings of our and third parties' Cookies in our cookiebot.

We may install and access most of Cookies as well as other similar technologies only if we obtained your consent for that. This consent is granted or refused in settings of your browser.

We may install some cookies based on the premise of a legitimate interest. Software used to view websites (browsers) usually allows Cookies by default. However users of the website may change the settings on Cookies at any time. Those settings may be changed in particular in such a way that blocks automatic service of Cookies in the browser, or informs about them every time a placement within user's device is going to happen. Specific information about possibilities and ways of servicing Cookies files are available at software settings of the browser.

Below you may find links to information how to turn on or off Cookies in given browsers:

Chrome:

<https://support.google.com/accounts/answer/61416?hl=en&co=GENIE.Platform%3DDesktop>

Mozilla:

<https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>

Edge:

<https://support.microsoft.com/en-us/search?query=disable%20cookies%20in%20microsoft%20edge>

Safari:

<https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

Opera:

<https://help.opera.com/en/latest/web-preferences/>

Turning off Cookies may affect some functionalities of the Website.

List of third parties

The current list of third parties who may install Cookies or use similar technologies when you visit our Website or our social media profiles or you read our content can be found below.

Please be aware that third parties may change their terms of service at any time.

Name of the third party	For what purpose do we use the third parties services	Link to the privacy policy and/or other similar documents
Meta (Facebook)	We embed or may embed social media tracking codes on our Website. This data may be linked with data collected when you use Facebook. It allows us to collect data about the users' demographics and come back with the marketing communications.	https://www.facebook.com/policy.php https://www.facebook.com/business/gdpr
Linkedin	We embed or may embed social media tracking codes on our Website. This data may be linked with data collected when you use Linkedin. It allows us to collect data about the users'	https://privacy.linkedin.com/gdpr

	demographics and come back with the marketing communications.	
Twitter	We embed or may embed social media tracking codes on our Website. This data may be linked with data collected when you use Twitter. It allows us to collect data about the users' demographics and come back with the marketing communications.	https://twitter.com/en/privacy
Google Analytics and GA Connector	We analyse users behaviour on our Website. We use Google Analytics in conjunction with Google Adwords and Google Adsense, to advertise.	https://policies.google.com/privacy https://business.safety.google/adsservices/ https://business.safety.google/adsprocessor/terms/
Google AdSense and Google Ads (previously: Google Adwords), also in connection with Youtube	We use this for our marketing campaigns in Google network.	https://policies.google.com/privacy https://business.safety.google/adscontroller/terms/
Tawk.to	We use this chat tool on our Website.	https://www.tawk.to/privacy-policy/
HotJar	We analyse users behaviour on our Website.	https://www.hotjar.com/legal/policies/privacy/
Freshsales	We use Freshsales for: <ul style="list-style-type: none"> - marketing mailings, - tracking how visitors behave on our Website, as well as whether they read our emails and click on links included in marketing mailings. 	https://www.freshworks.com/data-processing-addendum/
Zapier	We may use this tool to combine data from different apps.	https://zapier.com/help/gdpr/ https://zapier.com/privacy/
Snov.io	Snov.io helps us to find contact with people who may be interested in our offer.	https://snov.io/privacy-policy
Hunter.io	Hunter.io helps us to find contact with people who may be interested in our offer.	https://hunter.io/privacy-policy