

**PRIVACY POLICY dated November 4, 2013.**

Galena Sp. z o.o., having a company seat in Gliwice, located at ul. Świętokrzyska 2, 44-100 Gliwice, and entered into the Register of Enterprises kept by the Gliwice Regional Court, 10th Division of the National Economic Court Register, under the number KRS 0000133373, and known hereinafter as "**Galena**" ("we"), obliges itself to protect and respect your privacy.

The following privacy policy, as well as the Smartgroschen Service Provision Regulations and all other documents mentioned in these documents, outlines the rules according to which personal data will be stored and gathered by us and provided by you. Please carefully read the following content in order to fully understand our position and practices pertaining to your personal data and its treatment.

If you do not agree to the Privacy Policy, please do not visit the services, register, install the Application or purchase products and services available under the Smartgroschen brand offered by Galena Sp. z o.o.

**INFORMATION WHICH WE CAN GATHER – What data do we collect about you and in what way do we use it?**

*Data gathered during registration*

In order to utilise certain functions of our service, you will have to register. During registration we ask for your email address and password, which you will use on our system, as well as your country or language.

Data regarding the device onto which you install the application is also taken automatically (IMEI and SERIAL numbers).

*Data gathered during usage of the application on a mobile device (tablet, smartphone)*

So that you may use the on-line check function and that your contacts from your telephone are available, it is essential for us to garner certain data from your contact list (the contact's name and email address). You may, but do not have to, utilize this function.

When you make a call, data pertaining to the call is gathered, such as: data transmission, circumstances and connection type.

Smartgroschen websites and software clients are not intended for or designed to attract users under the age of 13. We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without parental permission.

*Data gathered during the purchase transaction*

In order that we may complete the top-up purchase transaction or other services, we ask for data connected to the form of payment, for example: credit card or on-line transaction.

All client payments are serviced by PayPal, Google Wallet or the Apple Store. In such cases only the systems of PayPal, Google Wallet and Apple Store know and are responsible for data given on their forms. The forms of PayPal, Google Wallet and Apple Store are found on their services and are appropriately technologically encoded.

*Data gathered when you contact us*

When you contact us using our internet site, mobile application, email, telephone, or other methods, you give us certain personal data, for example: name and surname, email address, etc. In such cases we may keep a record of such contact or correspondence.

*Unsolicited Contact*

Galena Sp. z o.o. retains the right to send unsolicited messages to persons whose contact data is in our possession and who have accepted the Privacy Policy.

The notion of unsolicited contact is understood by Galena Sp. z o.o. to be connected to information directly regarding its services and product (e.g. changes, internal promotions) and non-commercial lists (e.g. requests, personal comments, etc)

*Other Forms*

Our site or Application may, from time to time, contain links to or from partner websites, advertisers and affiliated networks. If you click on a link to any one of these internet pages, you should bear in mind that the same such sites have their own Privacy Policies and we do not bear

any responsibility for them. Please familiarise yourself with these privacy policies before giving any personal data to such sites.

#### *Automatically gathered data*

For site administration and aggregated data collection for advertisers we may gather available information about your device (computer, tablet, smartphone), including but not limited to, IP address, domain name, operating system and browser type. This is statistical data connected to the viewing of our sites by users.

We may, for the same reason, gain information pertaining to your general internet usage through cookie files saved on the hard disk of your computer. Cookie files contain information which is sent to the computer's hard disk.

You may block the function for saving cookies through the settings on your browser. However, if you choose this option, you may not have access to parts of our site or services. If you do not block cookie files in the settings on your browser, our system will generate cookie files when entering our site.

Remember that our advertisers can also utilise cookie files which may be under our control.

A detailed cookie files Policy can be found at the following web address: [www.smartgroschen.com/page/policy](http://www.smartgroschen.com/page/policy)

#### **In what way to we use your personal data?**

In no case will we sell information we have gathered about you to a third party.

Data gathered during registration will be used exclusively to enable you to log in to our system.

Registration is obligatory if you would like to use the Smartgroschen application on mobile devices or top-up an account.

Data gathered during purchase transactions will be used in order to complete such transactions, including receipt of any monies from you and the delivery of ordered goods. Your data may be passed on to firms responsible for the execution of payment transactions and charging, for example, your credit card. These firms will not use your data for any other purpose. The transfer of such data to such parties is obligatory if you wish to complete a purchase transaction.

By registering to the service you agree to receive unsolicited contact. We use your personal data to send information directly connected to our services and products (e.g. changes, internal promotions) and non-commercial lists (e.g. requests, personal comments, etc).

Automatically gathered data may be used to analyse user behaviour on our internet site, to collate demographic data about our users or for the personalisation of website content. Data is automatically gathered about each user.

Data gathered during correspondence between you and our service team will be used exclusively to answer your enquiries.

In the case of a General Inspection by the Inspectorate for the Protection of Personal Data, your data may be made available to an employee of the Inspectorate in accordance with the act pertaining to personal data protection.

In the case of a breach of our service Regulations or the law, or when demanded under legal remit, we may allow an appropriate organ of justice access to your data.

#### **DATA STORAGE – TELECOMMUNICATION CONFIDENTIALITY**

Galena Sp. z o.o. guarantees that it will abide by legal regulations regarding telecommunication confidentiality, with particular regard to confidentiality concerning information given during service usage, personal user data, transmission data, information regarding the circumstances and type of any connection, as well as other information about the Service with the exception of cases where provision of confidential telecommunication data, or parts thereof, is allowed or required by legal regulations.

Protected data will be stored by Galena Sp. z o.o., or an authorised party, in accordance with legal regulations, for purposes related to the provision of Services (including for considering reclamations), assuring the execution by such authorised parties of their responsibilities concerning data protection, your security and safety and public order when undertaking duties resulting from the running of the private enterprise Galena Sp. z o.o.. Protected data will also be stored by Galena within the scope and timeframe defined in the distinct consent given by the client. Galena Sp. z o.o. stores said data for a period essential to the provision of Service, investigation of claims and fulfillment of legal obligations, or for any other time agreed upon with the User. The scope of Transmission Data and other data stored concerning the User depends upon the type of Service provided to the User and User activity within the Service.

## **WHERE DO WE STORE YOUR PERSONAL DATA?**

Data gathered by us will be stored within the European Economic Community but we retain the right to move and store such data outside of the European Economic Community. We take all reasonable and necessary steps to ensure that data is treated in a safe manner in accordance with our privacy policy.

All information given to us is stored on safe servers and all communication with our intermediaries, as well as the Application on mobile devices, during the registration process and after logging on to a protected part of our internet site, will be encoded using SSL protocols. If you receive a password from us or set up a password allowing access to some parts of our internet site, you carry the responsibility for keeping it secret. Please do not allow anyone access to your password.

Unfortunately, the transmission of information through the internet is not totally safe. Although we do take the utmost care to protect your data, we cannot guarantee the safety of data passed on to our site and all data is given at your own risk. After receiving data from you, we implement rigorous procedures and safety measures in an attempt to inhibit unauthorised access.

## **How will we contact you?**

If you have completed a purchase transaction, you may receive an email from us regarding your transaction. We may also contact you by telephone if we have important information regarding your transaction.

If you have registered to the service, you will sporadically receive unsolicited email from us.

## **YOUR RIGHTS**

You have the right to approach us with a request not to store your personal data. You may invoke your right to edit or delete data. You have the right, at any time, to contact us at our company seat at the following address, Galena Sp. z o.o., ul. Świętokrzyska 2, 44-100 Gliwice, or by the contact form on the web page [www.smartgrochen.com](http://www.smartgrochen.com).

It is crucial to us that service users have access to their personal data. If data is incorrect, we try to allow for it to be changed or deleted in quick time as we must retain such data for justifiable business or legal purposes. While updating personal data, the user may be asked to confirm his identity in order for the request to be approved.

Data used during purchase transactions cannot be changed or deleted as it is part of a receipt or invoice. Automatically gathered data cannot be changed or deleted.

## **CHANGES TO THE PRIVACY POLICY**

All future changes to our privacy policy will be published on this site. We retain the right to execute changes to other documents on this site as parts of this privacy policy.

## **CONTACT**

Questions, remarks and motions concerning the privacy policy are received with pleasure and should be sent via our contact form on [www.smartgrochen.com](http://www.smartgrochen.com).