

PRIVACY POLICY

Dear User,

when you visit our website (<https://jetsnatch.com>) and use our services (software applications or other services that we may provide), we may process certain information about you such as information about a device you use, country you are from, your IP address, including personal data you wish to share with us by registering an account or subscribing for a newsletter or otherwise interacting with the website or using our services.

Additionally, we process your personal data when you enter and interact with our social media profile on Facebook® (<https://www.facebook.com/jetsnatch>), Instagram® (<https://www.instagram.com/jetsnatch/>) and YouTube® (<https://www.youtube.com/jetsnatch>) or other social media platforms. In such case we may process your personal data for example your name, surname, profile picture and information you shared with us in messages, comments or other interaction with the profile.

Any personal data we collect will be used in accordance with applicable laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR").

This privacy policy governs how we process your personal data we collect, including but not limited to:

- through our website <https://jetsnatch.com> (which in this policy is referred to as the "Website");
- through social media profiles on Facebook®, Instagram® and YouTube® or other social media platforms (which in this policy are collectively referred to as "Jetsnatch Social Media");
- when you use our software applications and/or other services that we may provide to you on your request, including via said software applications (which in this policy are collectively referred to as "Jetsnatch Services").

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

Any personal data collected via the Website or Jetsnatch Services are controlled by **SMART KETTLEBELL SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ** with its registered office in Wrocław, ul. Życzliwa 33, 53-030 Wrocław, Poland, entered into the business register of KRS (national court register) under no 0000888916, having NIP (tax identification number) PL8992895285 (hereafter referred to as "Jetsnatch" or "we" or "us").

Any personal data collected via Jetsnatch Social Media are co-controlled by us together with operators of social media platforms where Jetsnatch Social Media have been set-up. The details on how operators of the above-mentioned social media platforms process your personal data may be found on respective websites of Jetsnatch Social Media platforms:

- Facebook® - <https://www.facebook.com/privacy/policy>;
- Instagram® - <https://privacycenter.instagram.com/policy>;
- YouTube® - <https://www.youtube.com/howyoutubeworks/our-commitments/protecting-user-data/>

You may contact us at any time in relation to personal data of yours processed by us.

Our contact details: gdpr@jetsnatch.com

2. DATA THIS POLICY APPLIES TO.

This privacy policy applies to information, including personal data, we collect:

- through the Website;
- through Jetsnatch Social Media;
- when you use the Jetsnatch Services.
- when you interact with our advertising materials and applications on third-party websites and services if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Jetsnatch offline; or

- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website, including Jetsnatch Social Media plugins, or when you use Facebook®, Instagram®, YouTube® or other social media platform in the part co-controlled by the operators of these platforms.

The term ‘**personal data**’ as used herein comprises any information relating to an identified or identifiable natural person; 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.

3. CHILDREN UNDER THE AGE OF 16

The Website and Jetsnatch Services are not intended for children under 16 years of age. No one under age 16 should provide any personal data through the Websites or Jetsnatch Services. We do not knowingly collect personal data from children under 16. If you are under 16, please do not use or provide any information on Websites or Jetsnatch Services or through any of its features, use any of the interactive or public comment features of the Website or provide any personal data to Jetsnatch. If we learn that we collected or received personal data from a child under 16 without verification of parental consent, Jetsnatch will delete that information. If you believe we might have any personal data about a child under 16, please contact us.

4. INFORMATION JETSNATCH COLLECTS THROUGH THE WEBSITE

Jetsnatch collects information, including personal data:

- directly from you when you provide it to us or automatically as you enter and navigate through the Website always with your consent; and/or
- automatically as you enter and navigate through the Website through essential cookies, without your express consent. Such information may include usage details, information on a device you use, country you are from, web browser you use and your IP address. We do not collect any other personal data in such way, for example name, surname, or e-mail address.

If we collect information or personal data with your express consent such personal data will be collected and processed only within the scope of such consent. You may withdraw the consent at any time however the withdrawal of the consent will not affect the lawfulness of processing of the data based on your consent before the withdrawal.

The provision of all personal data **is voluntary**, however necessary for you to access and use the Website and its functionalities.

We also may collect information you have published or displayed (hereinafter, “posted”) on public areas of the Website, or shared with other users of the Website by using the functionalities of the Website (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although please be aware that no security measures are perfect or impenetrable. Additionally, Jetsnatch cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Any publication of a photograph on the Website containing your image, constitutes a consent to use such image by Jetsnatch on the Website.

We may request additional personal data to provide you with certain services available on the Website. If such personal data are not provided by you, Jetsnatch will not be able to provide you requested services.

YouTube® embedded videos

We may use services from YouTube® by placing video player on the Website. In doing so we use the option of “Privacy Enhanced Mode” provided by YouTube®, which means that when you watch a YouTube® video embedded on our Website, a connection to the YouTube® servers is established, the contents is displayed on the Website through the video player, however no YouTube® cookie is saved on your device. This means that watching a video in the Privacy Enhanced Mode of the embedded

player will not be used to personalize your YouTube® browsing experience, either within your Privacy Enhanced Mode embedded player or in your subsequent YouTube® viewing experience. Please be aware however that your data is sent to the YouTube® servers and if you are logged in to YouTube®, this information is assigned to your YouTube® account. You may prevent this by logging out of your YouTube® account before watching the video on our Website.

5. COOKIES

Cookies are text files containing small amounts of information which are downloaded to your device when you visit any website. You can find more information about cookies at: www.allaboutcookies.org and www.youronlinechoices.eu.

Cookies do lots of different jobs, like letting you correctly display a website, navigate between pages efficiently, remembering your preferences (for example language choice), and generally improving the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

Cookies are referred to as session or persistent, depending on how long they are stored on your computer or device:

- Session cookies only last for the length of your online session. They disappear from your computer or device when you close your browser.
- Persistent cookies stay on your computer or device after the browser has been closed and last for a set period of time specified in the cookie. These cookies are activated each time you visit the site that generated the cookie.

Jetsnatch does not use cookies with the aim of collecting commercial data for sale to third parties.

Currently we use following types of cookies on the Website:

Necessary (essential) cookies

These cookies are necessary for you to enter and display the Website and to use services available on the Website, for example authentication cookies used for authentication services on the Website during a session or user-centric security cookies which are used for increasing the security of the service explicitly requested by the user, error tracking and reporting.

These cookies are automatically saved on your device without your explicit consent as they are exempted from such consent by law. You may disable such cookies only in cookies management Section of your web browser.

Performance cookies

Performance cookies collect information about how visitors use a website, for instance which pages visitors go to most often, which functionalities of the Website they use and monitor the traffic on the Website. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

The Website currently uses one performance cookie - Google Analytics.

Google Analytics is a web analytics service provided by Google Ireland Ltd. Google Analytics sets a cookie to evaluate your use of the Website and compiles reports on user activity. Google stores the information collected by the cookie on servers in the United States and other countries. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Use of these cookies requires your express consent which you may give us through cookie banner on the Website or options of your web browser.

Functional cookies

These cookies allow a website to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, font and other parts of website that you can customize. They may also be used to provide services you have

asked for such as watching a video available on a website. The information these cookies collect are anonymized and they generally cannot track your browsing activity on other websites.

Use of these cookies requires your express consent which you may give us through cookie banner on the Website or options of your web browser.

Advertising cookies

Cookies of third parties that are used for behavioral advertising and other purposes such as advertisement affiliation, research, and market analysis.

Currently on the Website we use:

- Facebook Pixel - promotional and advertising actions based on re-engagement. These cookies serve for Meta Platforms Inc. to reach out to people who previously visited our Website and match the right people with the right message. These features' goal is to attract past visitors back to our Website. You may find privacy policy regarding advertisement on Facebook® or other social media platforms of Meta Platforms® here: https://www.facebook.com/adpreferences/ad_settings
- Apple Search Ads - promotional and advertising actions based on re-engagement. These cookies serve for Apple Inc. to reach out to people who previously visited our Website and match the right people with the right message. These features' goal is to attract past visitors back to our Website. You may find privacy policy of Apple Inc. here: <https://www.apple.com/legal/privacy/data/en/apple-advertising/>
- Google Ads – promotional and advertising actions based on re-engagement. These cookies serve for Google LLC to reach out to people who previously visited our Website and match the right people with the right message. These features' goal is to attract past visitors back to our Website. You may find privacy policy of Google LLC here: <https://policies.google.com/technologies/partner-sites?hl=en-US>

Use of these cookies requires your express consent which you may give us through cookie banner on the Website or options of your web browser.

Jetsnatch does not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Managing cookies in your browser

Modern browsers allow you to perform several tasks in relation to cookies including the ability to view the cookies currently stored on your computer or device and delete them on an individual basis, block third party cookies, block cookies from websites, prevent all cookies from being set and delete all cookies when you close your web browser.

You should note that any individual preferences will be lost if you delete cookies, including a preference to opt out of cookies (since this requires an opt-out cookie to be set). If you choose to block cookies completely, many websites will not work properly, and some functionality may be lost.

6. JETSNATCH SOCIAL MEDIA

We may use Jetsnatch Social Media profiles to reach out to our customers and provide them with additional promotional contents, information on our services, products and events and otherwise interact with the users of social media platforms.

Currently we have Jetsnatch Social Media profiles established on Facebook®, Instagram® and YouTube®.

The providers of these platforms are usually located outside the European Union, which means that the personal data of the users, including yours, if you decide to visit Jetsnatch Social Media, may be processed outside the European Union. Each of these providers introduced certain measures to make sure that the processing of personal data of the users complies with GDPR or any other applicable personal data protection regulations.

The details on the privacy policy of current providers of our Social Media you can find here:

- Facebook®: <https://www.facebook.com/privacy/policy/>

- Instagram®: <https://privacycenter.instagram.com/policy>;
- YouTube®: <https://policies.google.com/privacy>

We cannot accept responsibility for any issues arising in connection with the use of your personal data by the providers of Social Media platforms, the website content or the services offered to you by these providers. Jetsnatch therefore advises you to check any Social Media providers privacy policies before you submit any personal data on these websites.

When you display Jetsnatch Social Media and interact with them, we process certain information about you, including personal data, such as:

- your personal data you made available to the users of the social media platforms;
- user interactions (posts, likes, communications with us);
- data collected through Jetsnatch Social Media cookies (please see below).

To see how we process these data, please see Section 8 of this policy.

Social Media cookies

We may use analytical, and statistics functions of social media platforms based on cookies which are saved on your device when you enter and use these platforms and visit Jetsnatch Social Media. We may receive anonymized data from the providers of these platforms for statistical and analytical purposes.

If you wish to receive more information on how the above cookies work, please refer to privacy policy of the current operator of Jetsnatch Social Media which are linked above.

7. INFORMATION JETSNATCH COLLECTS WHEN YOU USE JETSNATCH SERVICES

You must register a user account if you wish to use Jetsnatch Services. Jetsnatch collects information, including personal data directly from you when you provide it to us during the registration process or when you use the Jetsnatch Services. We are requesting following information and personal data when registering the user account or when you use the Jetsnatch Services (some of them a required):

- name;
- surname;
- email address;
- password to the user account;
- gender;
- age;
- weight;
- height.

The provision of all personal data **is voluntary**, however some of the personal data are necessary for you to access and use Jetsnatch Services.

You must acknowledge our privacy policy when registering the user account and accept the respective general terms and conditions of Jetsnatch Services.

After providing us with your personal data, you will receive a registration link to the email address you have provided to us. The registration link is valid for three days. Your user account will be created after you have confirmed your registration using the link. If you do not confirm the registration of the user account by the time the confirmation link expires, your personal data will be deleted immediately.

Your user account is private, which means it is not visible to other users. However, you will be able to share your workout experience on your profile on Facebook® and/or Instagram®.

You may change or update the information and personal data you have provided to us anytime, however changing your email address is not possible. If you wish to change your email address, you must delete your current user account and create a new one.

If you wish to use some of the functionalities of Jetsnatch Services, we may require an access your device's camera and/or your media library. You will be informed when Jetsnatch Services require such access, and we will only access these means and data with your approval. However, if you do not consent to such access, you will not be able to use these functionalities of Jetsnatch Services.

We will not be using any analytical, marketing or tracking technologies in connection with our Jetsnatch Services.

You may delete your user account anytime you want. If you delete your account, we will no longer be able to provide you with Jetsnatch Services. Deleting of your user account will affect all your progress and results, which will also be deleted permanently. Deleting your user account will not mean that we will delete your personal data, as we will be entitled and sometimes obliged to process your personal data after such deletion (for more information please see Section 8 of this policy).

8. PROCESSING OF INFORMATION AND PERSONAL DATA

In principle, we will use your information and personal data which we have legally collected to provide you with the access to the Website and its contents and/or to provide Jetsnatch Services.

We may use the information, except for personal data (processing of which is described further below), which we have collected for a range of business-related purposes, including but not limited to:

- display the Website and its contents to you and enable you to use functions of the Website and its contents;
- evaluate and respond to your requests, inquiries, and applications;
- communicate with you through various channels;
- publish public product reviews as submitted by you;
- comply with obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure, and quality, generally improve and provide security;
- control the compliance of your actions with and enforcement of applicable legal requirements and our policies and terms and conditions; determine, protect and enforce any of our rights, including an assignment to any third party;
- carry out summaries, analysis, statistics in order to operate, evaluate, and improve business, products and services (including developing new products and services; managing our communications; determining and managing the effectiveness of advertising and marketing; analyzing products, services, websites and applications; administering the Website, Social Media profiles and Jetsnatch Services);
- direct marketing;
- conclude and perform contracts to provide services and deliver products including Jetsnatch Services;
- fulfill any other purpose for which you provided it;
- in any other way Jetsnatch may describe when you provide the information.

Following personal data collected through the Website are processed by Jetsnatch for following purposes, terms and on following legal grounds:

Purpose	Personal data	Legal basis	Duration
<ul style="list-style-type: none"> ▪ present the Website and its contents to you and enable you to use functions of the Website and its contents, generally improve and provide security. 	<ul style="list-style-type: none"> ▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time. 	<ul style="list-style-type: none"> ▪ Article 6 pt. 1.f GDPR – legitimate interest 	<ul style="list-style-type: none"> ▪ For the time of using the Website and afterwards until you end the session of web browser.
<ul style="list-style-type: none"> ▪ carry out summaries, analysis, statistics in order to operate, evaluate, and improve the Website, business, products, and services (including developing new products and services; managing our communications; determining and managing the effectiveness of advertising and marketing; analyzing products, services, websites and applications; administering the Website and applications), provide additional functionalities of the Website. 	<ul style="list-style-type: none"> ▪ Data received from the computer, mobile phone or other device you use to access the Website: IP address, location and time. 	<ul style="list-style-type: none"> ▪ Article 6 pt. 1.a GDPR – consent 	<ul style="list-style-type: none"> ▪ For the time needed to carry out such activities, no longer than 14 months or until withdrawal of the consent.
<ul style="list-style-type: none"> ▪ evaluate and respond to your requests, inquiries, and applications; communicate with you through various channels. 	<ul style="list-style-type: none"> ▪ Contact and identification information provided by you: name, surname, email address. 	<ul style="list-style-type: none"> ▪ Article 6 pt. 1.a GDPR - consent 	<ul style="list-style-type: none"> ▪ For the time needed to complete the exchange of communication and 3 years afterwards or until withdrawal of the consent.

▪ newsletter	▪ Contact and identification information provided by you: name, surname, email address.	▪ Article 6 pt. 1.a GDPR - consent	▪ Indefinite or until the withdrawal of the consent.
▪ carry out obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure and quality.	<ul style="list-style-type: none"> ▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time. ▪ Contact and identification information provided by you: name, surname, email address. 	▪ Article 6 pt. 1.c GDPR – legal obligation	▪ For the time needed to carry out such obligation.
▪ control the compliance of your actions with and enforcement of applicable legal requirements and our policies and terms and conditions; determine, protect and enforce any of our rights, including an assignment to any third party;	<ul style="list-style-type: none"> ▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time. ▪ Contact and identification information provided by you: name, surname, email address. 	▪ Article 6 pt. 1.f GDPR – legitimate interest	▪ Until the expiry of limitation period for claims.
▪ direct marketing, excluding newsletter or any other form of email communication	▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time.	▪ Article 6 pt. 1.a GDPR - consent	▪ For the time of using the Website and afterwards until you end the session of web browser.
▪ re-engagement advertisement	▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time.	▪ Article 6 pt. 1.a GDPR – consent	▪ No longer than 24 months in case of Google Ads and 180 days in case of Facebook Pixel or until withdrawal of the consent.
▪ other purpose	▪ As agreed	▪ Article 6 pt.1.a GDPR- consent	

Following personal data collected through Jetsnatch Social Media are processed by Jetsnatch for following purposes and on following legal grounds:

Purpose	Personal data	Legal basis	Duration
▪ carry out summaries, analysis, statistics in order to operate, evaluate and improve Jetsnatch Social Media, our products, and services (including developing new products and services; managing our communications; determining and managing the effectiveness of advertising and marketing; analyzing products, services, websites and applications; administering social media profile and applications);	▪ Data received when you interact with Jetsnatch Social Media: name, surname, posted contents, photographs, user interactions.	▪ Article 6 pt. 1.f GDPR – legitimate interest	▪ For the time needed to carry out such activities no longer than 24 months.
	▪ Data received automatically from the computer, mobile phone or other device you use to access the Website: IP address, location and time.	▪ Article 6 pt. 1.a GDPR – consent	▪ For the time needed to carry out such activities, no longer than 14 months, or until withdrawal of the consent
▪ publish on Jetsnatch Social Media profile public product reviews as submitted by you or your comments.	▪ Data received when you interact with Jetsnatch Social Media: name, surname, posted contents, photographs, user interactions.	▪ Article 6 pt. 1.f GDPR - legitimate interest	▪ For the time you have an account on social media portal or until you delete such comment.
▪ carry out obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure and quality.	▪ Data received when you interact with Jetsnatch Social Media profile: name, surname, posted contents, photographs, user interactions.	▪ Article 6 pt. 1.c GDPR – legal obligation	▪ For the time needed to carry out such obligation.

<ul style="list-style-type: none"> control the compliance of your actions with and enforcement of applicable legal requirements and our policies and terms and conditions; determine, protect, and enforce any of our rights, including an assignment to any third party; 	<ul style="list-style-type: none"> Data received when you interact with Jetsnatch Social Media: name, surname, posted contents, photographs, user interactions. 	<ul style="list-style-type: none"> Article 6 pt. 1.f GDPR – legitimate interest 	<ul style="list-style-type: none"> Until the expiry of limitation period.
<ul style="list-style-type: none"> communicate with you through various channels, including for advertisement purposes, however we do not initiate contact. 	<ul style="list-style-type: none"> Contact and identification information provided by you: name, surname, email address, posted contents, photographs, user interactions. 	<ul style="list-style-type: none"> Article 6 pt. 1.a GDPR - consent 	<ul style="list-style-type: none"> For the time needed to complete the exchange of communication and 3 years afterwards or until withdrawal of the consent.

Following personal data collected from you when using Jetsnatch Services are processed by Jetsnatch for following purposes and on following legal grounds:

Purpose	Personal data	Legal basis	Duration
<ul style="list-style-type: none"> register a user account to use Jetsnatch Services and supply of Jetsnatch Services. 	<ul style="list-style-type: none"> Data received when you register a user account and/or when you use Jetsnatch Services: name, surname, email address, weight, height, gender, age. 	<ul style="list-style-type: none"> Article 6 pt. 1.b GDPR - performance of the contract. 	<ul style="list-style-type: none"> For the time you have the user account and afterwards until the expiry of applicable limitation period.
<ul style="list-style-type: none"> carry out obligations as required by applicable laws, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure, and quality. 	<ul style="list-style-type: none"> Data received when you register a user account and/or when you use Jetsnatch Services: name, surname, email address, gender, age. 	<ul style="list-style-type: none"> Article 6 pt. 1.c GDPR – legal obligation 	<ul style="list-style-type: none"> For the time needed to carry out such obligation.
<ul style="list-style-type: none"> communicate with you through various channels, including for advertisement purposes, however we do not initiate contact. 	<ul style="list-style-type: none"> Contact and identification information provided by you: name, surname, email address. 	<ul style="list-style-type: none"> Article 6 pt. 1.a GDPR - consent 	<ul style="list-style-type: none"> For the time needed to complete the exchange of communication and 3 years afterwards or until withdrawal of the consent or deletion of the user account.

Personal data collected for purposes other than compliance with legal obligation may be subject of profiling, which is an automated processing of personal data to analyze or predict aspects concerning your personal preferences or behavior (for example, to personalize the Website, Jetsnatch Services or marketing content sent to you). This pertains particularly to Google®, Meta Platforms® and Apple® advertising services.

We will not use automated individual decision-making producing any legal effects or significantly affecting you.

9. SHARING OF THE INFORMATION WE RECEIVE

Jetsnatch uses third parties service providers to carry out certain activities on its behalf. Examples include operating IT systems, including e-mail, hosting services, providing IT resources, analyzing data, providing marketing assistance, and providing customer service, legal services, accounting services etc. These third parties are processors of your personal data which are needed to perform their services but may not use such personal data for other purposes. We will ensure that any processing of personal data by processors complies with provisions of GDPR, especially that any such processor is aware of and abides by obligations set for the therein. We will also ensure that any processor treats your personal data no less protective as required by applicable data protection laws and that they adopt adequate technical and organizational security measures.

We may share your personal data with other controllers, when we believe it necessary to comply with the law, to protect the rights or safety of the Website, the Jetsnatch Services, other users, or third parties (e.g., for fraud protection purposes, settlements purposes). Without limitation, this may include cases in which we share your personal data with government authorities, local authorities or court authorities, persons running offices of business information and assignees. Jetsnatch will carefully determine the

permissibility of providing personal data in each such context, paying particular attention to the type of request, types of data affected and any impact that a disclosure of personal data would have on the user affected. Should we decide to disclose personal data in such context we will also consider ways of reducing the scope of the disclosure, for instance by redacting the information provided.

We may disclose personal data as described in this policy to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about the Website and/or Jetsnatch Services users is among the assets transferred.

We may share your personal data with carefully selected third parties so they may contact you with offers and information about their goods and services or for other purposes on conditions that we have your consent to process your personal data for such purpose.

Recipients of your personal data may be located in any country. This may include countries where applicable data protection laws provide a lesser degree of protection than EU laws, especially countries outside the territory of European Union ("third countries"). In such case, we may transfer your personal data to a third country only where:

- the European Commission has decided that the third country, a territory or one or more specified sectors within that third country, ensures an adequate level of protection. Such a transfer shall not require any specific authorization, or
- adequate level of protection is applied for your personal data, for instance by ensuring that the recipient abides by so-called EC Model Clauses, which are sets of contractual clauses adopted by the European Commission for the purpose of adducing adequate safeguards to personal data in connection with cross-border transfers, or
- the transfer meets other requirements set forth in GDPR.

Currently we transfer your personal data collected through the Website to following entities who provide us with certain services:

- Google LLC with its registered office in California, USA and Google Ireland Ltd – entities that are providing us and are responsible for a tool and cookies for website traffic analysis (Google Analytics) and for a Google Ads cookies. In Section 5 of this privacy policy you may find details regarding cookies on the Website. Export of personal data to the USA is based on Standard Contractual Clauses accepted by European Commission and respective Data Processing Agreement.
- Meta Platforms, Inc with its registered office in California, USA and Meta Platforms Ireland Ltd. – entities that are providing us and are responsible for Facebook Pixel cookie. In Section 5 of this privacy policy you may find details regarding cookies on the Website. Export of personal data to the USA is based on Standard Contractual Clauses accepted by European Commission.
- Apple Inc. - entity that is providing us and is responsible for Apple Search Ads cookie. In Section 5 of this privacy policy you may find details regarding cookies on the Website. Export of personal data to the USA is based on Standard Contractual Clauses accepted by European Commission.
- cyber_Folks S.A. with its registered office in Poznan, Poland, – entity that is providing us with hosting services for the Website. Personal data transfer is governed by Data Processing Agreement.
- FreshMail spółka z ograniczoną odpowiedzialnością z siedzibą w Krakowie – entity that is providing us with mass correspondence services in relations to subscribers of our newsletter. Personal data transfer is governed by Data Processing Agreement.

Currently we transfer your personal data collected with regards to the Jetsnatch Services to following entities who provide us with certain services:

- Google Ireland Ltd – an entity that is providing us with Firebase® tool which is used by us solely for authentication purposes and verification if the user of Jetsnatch Services is logged in. Personal data transfer is governed by Data Processing Agreement.

10. LINKS TO THIRD PARTY WEBSITES

Jetsnatch may from time to time establish relationships with other third-party companies (including Social Media platforms) and the Website may contain links to and from such third-party websites. We will try to provide you with links to high quality, reputable websites which it believes will be of interest

and relevant to you, but please note that such third-party websites are not under its control and Jetsnatch does not contribute to the content of such sites.

If you follow a link to any third-party website, please note that they will have their own policies. When you click through to these websites you leave the area controlled by us. We cannot accept responsibility for any issues arising in connection with either the third party's use of your data, the website content or the services offered to you by these websites. Jetsnatch therefore encourages you to check any third-party website's policies before you submit any personal data on these websites.

11. SECURITY

Jetsnatch maintains administrative, technical, and physical safeguards designed and intended to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use. Despite these safeguards, due to inherent uncertainty in the use of the Internet and information systems and the potential for unlawful attacks by third parties, Jetsnatch cannot guarantee that the use of systems, websites (including the Website), the Jetsnatch Services or other applications will be completely safe or secure.

The safety and security of your personal data also depends on you. Where Jetsnatch has given you (or where you have chosen) a password for access to certain parts of the Website or Jetsnatch Services, you are responsible for keeping this password confidential. We kindly ask you not to share your password with anyone and change it from time to time. Jetsnatch also urges you to be careful about giving out information in public areas of the Website or Jetsnatch Services, if any. The information and personal data you share in public areas may be viewed by any user of the Website or Jetsnatch Services.

Unfortunately, the transmission of information via the Internet is not completely secure. Although Jetsnatch does its very best to protect your personal data, we cannot guarantee the full security of your personal data transmitted to the Website or Jetsnatch Services. Any transmission of personal data is at your own risk.

12. YOUR RIGHTS

You have following rights under GDPR in relation to your personal data:

- 1) accessing your personal data (including receiving copies thereof) – under article 15 GDPR;
- 2) correcting your personal data – under article 16 GDPR;
- 3) deleting your personal data – under article 17 GDPR;
- 4) to demand restriction of processing – under article 18 GDPR;
- 5) to demand transmission of personal data – under article 20 GDPR.

You may enforce the above rights by contacting our representative for data protection or sending a respective email to our address: **gdpr@jetsnatch.com**

We may require additional information enabling us to verify your identity and your right to enforce the above rights.

You can review and change your personal data by logging into your user account and visiting your account profile page.

Right to object

Apart from rights referred to in preceding paragraphs, you have the right to object, at any time, to processing of your personal data by us (including profiling) for direct marketing purpose on the basis of legitimate interest. After filing the objection, we will restrain from processing your data for this purpose.

You have also right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest (including profiling). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Right to withdraw consent

If we process your personal data based on your consent, you can withdraw your consent anytime, however such withdrawal will not affect the legality of the processing of the personal data carried out before the withdrawal.

Complaint

You have the right to lodge a complaint to Prezes Urzadu Ochrony Danych Osobowych. You may find details on the website: <https://uodo.gov.pl/> or with any other competent data protection authority about our processing of your personal data.

- if you are of the opinion that we process your personal data illegally.

13. CALIFORNIA CONSUMER PRIVACY ACT (CCPA) – ADDITIONAL PRIVACY RIGHTS

This privacy notice Section for residents of California state in the USA supplements the information contained in our policy and applies solely to all visitors, users, and others who reside in the State of California, USA.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device (which is further referred to in this Section as “personal information”. We apply to personal information all rules which in this policy govern personal data unless this Section 13 provides for otherwise.

The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve months.

Please note that the categories and examples provided in the list below are those defined in the CCPA.

This does not mean that all examples of that category of personal information were in fact collected by us but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected (for more details please see Section 7 of this policy). For example, certain categories of personal information would only be collected if you provided such personal information directly to us.

Category A: Identifiers.

Examples: a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: a name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes.

Category C: Protected classification characteristics under California or federal law.

Examples: age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: Yes.

Category D: Commercial information.

Examples: records and history of products or services purchased or considered.

Collected: Yes.

Category E: Biometric information.

Examples: genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and

voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

Category F: Internet or other similar network activity.

Examples: interaction with our services or advertisement.

Collected: Yes.

Category G: Geolocation data.

Examples: Approximate physical location.

Collected: No.

Category H: Sensory data.

Examples: audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

Category I: Professional or employment-related information.

Examples: current or past job history or performance evaluations.

Collected: No.

Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

Examples: education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

Category K: Inferences drawn from other personal information.

Examples: profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Under CCPA, personal information does not include:

- publicly available information from government records,
- deidentified or aggregated consumer information,
- information excluded by law from the CCPA's scope, such as: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Personal Information

Information about sources of your personal information you can find in Section 4, 5, 6 and 7 of this policy.

Use of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose personal information we have collected for "business purposes" or "commercial purposes" (as defined under the CCPA). Examples of such can be found in Section 8 of this policy.

If we decide to collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes we will update this policy.

Disclosure of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose and may have used or disclosed in the last twelve months the following categories of personal information for business or commercial purposes:

Category A: Identifiers

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))

Category D: Commercial information

Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact disclosed but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When we disclose personal information for a business purpose or a commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

For more information, please refer to Section 9 of this policy.

Sale of Personal Information

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that we may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

We have not sold the personal information we have collect and will not sell it without providing you the right to opt out.

Share of Personal Information

We may share your personal information identified in the above categories with the following categories of third parties: service providers, payment processors, our affiliates, our business partners, third-party vendors to whom you authorize us to disclose your personal information.

For more information, please see Section 9 of this policy.

Your Rights under the CCPA

The CCPA provides California, USA residents with specific rights regarding their personal information. If you are a resident of California, you have the following rights:

- the right to notice - you have the right to be notified which categories of personal information are being collected and the purposes for which they are being used.
- the right to request - you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and share of your personal information. Once we receive and confirm your request, we will disclose to you:
 - the categories of personal information we collected about you;
 - the categories of sources for the personal information we collected about you;
 - our business or commercial purpose for collecting or selling that personal information;
 - the categories of third parties with whom we share that personal information;
 - the specific pieces of personal information we collected about you;
 - if we sold your personal information or disclosed your personal information for a business purpose, we will disclose to you: the categories of personal information categories sold; the categories of personal information categories disclosed.
- the right to say no to the sale of personal information (opt-out) - you have the right to direct us to not sell your personal information. To submit an opt-out request please contact us.
- the right to delete personal information. You have the right to request the deletion of your personal information, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
 - detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;

- debug products/services to identify and repair errors that impair existing intended functionality;
 - exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
 - comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
 - engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
 - enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
 - comply with a legal obligation;
 - make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- the right not to be discriminated against - you have the right not to be discriminated against for exercising any of your consumer's rights, including by:
 - denying goods or services to you;
 - charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties;
 - providing a different level or quality of goods or services to you;
 - suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your CCPA Data Protection Rights

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can contact us anytime. Contact details are provided in Section 1 of this policy.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your personal information.

Your request to us must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative of such person;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with the required information if we cannot:

- verify your identity or authority to make the request; and/or,
- confirm that the personal information relates to you.

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures we provide will only cover the twelve months' period preceding the verifiable request's receipt.

For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

Do Not Sell My Personal Information

You have the right to opt-out of the sale of your personal information. Once we receive and confirm a verifiable consumer request from you, we will stop selling your personal information. To exercise your right to opt-out, please contact us.

Please note that any opt-out is specific to the web browser you use. You may need to opt-out on every browser that you use.

14. CHANGES TO OUR PRIVACY POLICY

We may revise, update and change this privacy policy at any time and without notice to you, subject to compliance with respective and applicable personal data protection regulations.

Wroclaw, May 2023.