

Privacy Policy of HiDone

1. General Provisions

- 1.1. The Privacy Policy of HiDone Application ("**Privacy Policy**") determines the methods of collection, processing and use of data concerning users of HiDone Application (hereinafter referred to as "**HiDone Application**" or "**Application**").
- 1.2. Personal data are processed pursuant to the provisions of the Regulation of the European Parliament and of the Council (EU) No. 2016/679 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), referred to in the Policy as: "**GDPR**". The full text of GDPR is available in the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>.
- 1.3. The administrator of personal data, i.e. the entity processing personal data of Users in the Application is HIDONE.com Ltd., with its legal seat in Sliema, Malta, at Tigne Place, Office M1, Block 12. We are entered in the register of entrepreneurs of the Commercial Court in Malta under Registration No. C88106. We will refer to ourselves in the further part of the Policy as the "**Administrator**", "**HiDone**" or "**We**".
- 1.4. The contact data of the Administrator are:
 - 1.4.1. E-mail address: kontakt@hidone.com
 - 1.4.2. Correspondence address: Tigne Place, Office M1, Block 12, Sliema, Malta.
- 1.5. Persons using the Application in any way are hereinafter referred to as "**Users**".

2. Scope of the Privacy Policy

- 2.1. The Privacy Policy concerns any services provided in the Web, described in detail in <http://hidone.com/regulamin>. Any ideas included in the Privacy Policy, beginning with a capital letter and undefined in the Privacy, have the same meaning as in the Regulation.
- 2.2. In particular, but not exclusively, the Privacy Policy describes the processing of the personal data of Users, in connection with electronic services described in detail in the Regulation.

3. Collection of personal data

- 3.1. The Administrator assures that collected data are processed in accordance with law, for legal purposes, and they are not processed further in any way inconsistent with such purposes.

We respect law for the protection of privacy and we guarantee to all persons using the Application that the data made available to us will be protected properly from the access of any third parties.

- 3.2. The Administrator shall collect information about Users in the Application in the following ways:
 - 3.2.1. by information introduced by Users in voluntary forms available in the Application;

3.2.2.by telephone or e-mail contacts between Users and the Administrator;

3.2.3.by recording the so-called cookies in terminals.

4. Collected personal data

4.1. The Administrator shall collect and process the following personal data:

4.1.1. surnames and given names;

4.1.2. birth dates;

4.1.3. photos;

4.1.4. residence addresses;

4.1.5. telephone numbers;

4.1.6. e-mail addresses;

4.1.7. any type of correspondence between Users and HiDone;

4.1.8. all performed and entrusted assignments placed on our Platforms or transferred through them to HiDone;

4.1.9. information related to accounting or financial transactions. They can include information about a debit card or data of a bank account of a user; as well as details of assignments offered through the Application;

4.1.10. information that can be required by HiDone from users, if any problems arise concerning the use of our Application or services, also requests for support;

4.1.11. information about a passport, driving licence, identity card and any other documents, if a User agreed to make such data available to us.

4.2. The Application can also save information about connection parameters (time, IP address).

4.3. To make the Application function properly, including the performance of services based on electronic agreements, it is necessary for the Administrator to use services offered by external entities (like software providers, couriers, payment handling entities). The Administrator contracts only such processing entities that guarantee sufficient technical and organisational measures for the fulfillment of GDPR requirements and protection of persons whose data are processed.

5. Legal basis

5.1. The Administrator is entitled to process personal data, if at least one of the following conditions is met: (1) a person agreed to the processing of his/her personal data for one or more specific purposes; (2) the processing is necessary for the performance of a contract if that person is a contract party; or for undertaking action requested by that person before a contract is concluded; (3) the processing is necessary for the fulfillment of legal duty burdening the Administrator; or (4) the processing is necessary for purposes resulting from

legal interests executed by the Administrator or a third party, unless such interests are inferior to interests or rights and liberties of a person making the data available, in particular if such a person is a child.

6. Aim and time period of data processing

Aim of data processing	Legal basis and period of processing	Scope of data processing
Performance of electronic services agreement	Article 6.1. b) of GDPR (performance of contract). Data shall be kept for a period necessary for the performance, termination or expiry of a contract.	Data shall be processed only as far as necessary for the performance of a contract, if a person related to the data is party thereof. Non-provision of the data shall result in the impossibility of the conclusion and performance of the contract.
Customer's account	Article 6.1. b) of GDPR (performance of contract). Data shall be kept for a period necessary for the performance, termination or expiry of a contract.	Data shall be processed only as far as necessary for the performance of a contract, if a person related to the data is party thereof. Non-provision of the data shall result in the impossibility of the conclusion and performance of Account services.
Newsletter	Article 6.1. a) of GDPR (consent). Data shall be kept until an interested person withdraws his/her consent.	Data shall be kept until an interested person withdraws his/her consent to further processing of his/her data for a given purpose.
Accounting books	Article 6.1. c) of GDPR, in connection with Article 86 § 1 of Tax Ordinance Act of 17 January 2017 (published in Dziennik Ustaw of 2017 item 201). Data shall be kept for a period of time specified in legal regulations, instructing the Administrator to keep tax books until the day of tax preclusion unless tax acts specify otherwise.	Data shall be processed only as far as necessary to fulfill the Administrator's legal duty.

Consideration of reclamations	Article 6.1. f) of GDPR (legal interest executed by the Administrator). Data shall be kept for a period of time necessary to consider reclamation.	Data shall be kept for a period of time necessary to fulfill the legal duty of the Administrator.
Statistic purposes	Article 6.1. f) of GDPR (legal interest executed by the Administrator). Data shall be kept for a period of time necessary to execute the legal interest by the Administrator, not longer than 10 years from the receipt of the data.	Data shall be processed as far as necessary for the execution of the legal interest performed by the Administrator.
Protection of claims	Article 6.1. f) of GDPR. Data shall be kept for a period of time corresponding to the existence of legal interest executed by the Administrator in connection with the Administrator's commercial activity, not longer than the preclusion term related to a person providing the data. The preclusion term is defined in legal regulations, in particular the Civil Code (the basic term is three years and two years for sale contracts).	Data shall be processed as far as necessary for the execution of the legal interest performed by the Administrator.

7. Data receivers

- 7.1. The use of the Application by Users involves the transfer of personal data to receivers. The receivers of personal data are all entities (natural persons, legal persons, the so-called defective legal persons, as well as public authorities) to which the personal data of Users are disclosed.
- 7.2. When a user uses our services some information about him/her is made available to the members of our community, both by the public profile of the user and during the arrangement of an order (e.g. the user's telephone number is made available to some members of our community for discussing the details of the order).
- 7.3. In particular, the personal data of Users can be passed to couriers, to enable the performance of sale agreements.

8. Automated data processing and profiling

8.1. Personal data processing can be automated, including profiling, to adapt offers displayed in the Application to the needs of Users. Automated data processing and profiling will cause no negative results for a person whose data are concerned.

9. Transmission of data beyond the European Union

9.1. Your data shall not be transferred beyond the European Union.

10. Your rights

10.1. If personal data are processed pursuant to the consent expressed by a User the User is entitled to withdraw the consent at any moment. Such a withdrawal shall not affect the legality of data processing carried out before the consent is withdrawn.

10.2. Furthermore, Users of the Application have the following rights:

10.2.1. Access to personal data stored by HiDone, including the following information:

10.2.1.1. purpose, scope and methods of data processing;

10.2.1.2. way of data sharing, in particular information about data receivers and types of receivers;

10.2.1.3. planned period of personal data storage; criteria of establishing such periods, if possible;

10.2.2. right to request the rectification of personal data;

10.2.3. right to request the limitation of the processing of personal data;

10.2.4. right to delete personal data from the Administrator's base;

10.2.5. right to transfer data to another entity;

10.2.6. right of complaint to a supervision authority, respecting the procedures specified in GDPR;

right of protest against the processing of personal data for marketing purposes or against their transfer to another data administrator:

11. Miscellaneous

11.1. The Policy will become effective on _____.

11.2. The Administrator is entitled to change the provisions of the Policy for important reasons, in particular:

11.2.1. extension or modification of the functionality of the Application;

11.2.2. introduction of new services or change of their scope, in particular making some or all services payable;

11.2.3. change of technical requirements necessary for the Application, in particular those concerning the facilities and computer system of the end user, change of technical

conditions of the provision of the services, new types of risk related to electronic services;

- 11.2.4. necessity of technical changes of the Policy, not affecting the rights and obligations of Users, in particular those aimed at the cancellation of mistakes and errors or change of references;
 - 11.2.5. necessity to modify the Policy to the requirements of law, in particular in regard of the provision of services;
 - 11.2.6. necessity to make services or the content of the Policy consistent with judicial and administrative decisions;
 - 11.2.7. making the Policy follow the best practice of services and protection of users;
 - 11.2.8. change of the data of the Administrator disclosed in the Policy, especially communication and address data.
- 11.3. All changes of the Privacy Policy will be introduced by the publication of the consolidated text of the Privacy Policy of the Application. No such changes will detriment the rights of Users. After the changes become effective the use of the Application will mean their acceptance.