

TooCard Privacy Policy

This Privacy Policy will help you understand what data we collect when you use the TooCard mobile app ("**TooCard**"), what we use it for and how you can exercise your rights . TooCard may contain links to other websites. Once redirected to such websites this Privacy Policy is no longer applicable.

TooCard's Privacy Policy applies to all users of our app. We will refer to all users simply as "**you**" or "**Users**".

Who is the controller of your personal data?

TooCard is an application developed by Tooploox, a limited liability company (sp. z o.o.) established under the laws of the Republic of Poland. Our registered seat is in Wrocław (53-601) at Tęczowa street 7. Our EU VAT ID (NIP) number is PL8992740358 and our Polish enterprise ID (REGON) is 022047421. We are entered into the register of entrepreneurs of the Polish National Court Register under KRS number 445336, and our registration records are kept by the District Court for Wrocław – Fabryczna in Wrocław, Poland ("**Tooploox**"). **Tooploox is the controller of your personal data.**

You can contact us via privacy@tooploox.com or, for topics not necessarily related to TooCard or your privacy, via hello@tooploox.com.

What information do we collect and when?

Whenever you make use of TooCard, we will record certain information connected with the way you use it. This information may encompass:

- a. our servers log information gathered when you connect with TooCard (e.g. your web request, IP address, TooCard app version, date and time stamp information);
- b. information about the device that you use to connect with TooCard (e.g. the type of device that you are using, the system under which it operates, your network information and unique device identifiers such as your MAC address);
- c. Information contained in business cards which you create using TooCard, including your full name, company name, position, e-mail address and phone number.

What do we use your personal data for?

We use your personal data for the following purposes:

- a. to provide TooCard to you;
- b. to market our services to you;
- c. to protect ourselves against or pursue legal claims which may arise in connection with your use of Toocard.

The processing of your personal data is either necessary to perform a contract which is concluded between you and us when you decide to use TooCard and accept our Terms and Conditions (point a.) or

is based on our legitimate interest (point b. [direct marketing of our services] and c. [protection against legal claims]). Providing your personal data is completely voluntary.

How long do we keep your data?

We will process your personal data for the whole duration of your use of TooCard and additionally, after you stop using TooCard, until all your claims associated with TooCard become time-barred. You may, however, at any time, object against the processing of your personal data for the purposes indicated in points b. and c. above.

What are your rights?

General

In order to comply with requests concerning your rights, we may ask you to give us some additional information that we will use to verify your identity. If you fail to provide such information and the information that you have already given to us is not sufficient to identify you, we may refuse to fulfill your request.

If you wish to exercise any of the rights described below you can do this by contacting us at privacy@tooploox.com.

Access to data

You have the right to access the information that we have on you. If you choose to exercise this right, upon your request, we will also make sure to provide you with a copy of the data we process about you.

We will fulfill your request by sending your copy electronically, unless the request expressly specifies a different method. For any subsequent access request, we may charge you with an administrative fee.

Rectification of data, erasure and restriction of processing

If you believe that the information we have about you is incorrect, you are welcome to contact us, so we can update it and keep your data accurate.

We will automatically delete information about you after it is no longer needed for the purposes it was collected for. Nonetheless, if at any point you wish for us to delete information about you, you have the right to do so.

You also have the right to obtain restriction of processing of your data.

Data portability

In case the processing of your personal data is based on a contract or your consent, you have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format. You can also request us to transmit such data to another controller if it is technically feasible.

Withdrawal of consent and the right to object to processing

If the processing of your data is based on a consent, you have the right to withdraw your consent at any time. Remember that withdrawal of consent will not affect the lawfulness of processing based on this consent before its withdrawal.

In case the processing of your data is based on our legitimate interest you have the right to object to such processing.

Profiling

We do not use any information provided by you for the purposes of automated decision-making, including profiling.

Disclosure of your data

We guarantee that all your personal information is protected, and that we will not make this information available to third parties in cases different than those specified below, unless you give us a permission to do so or unless such disclosure is necessary to comply with a legal obligation that is imposed on us.

We may share information that you gave to us with the following:

- a. providers of services necessary to make TooCard available to you (e.g. hosting and other IT services);
- b. providers of services necessary to automate and simplify the deployment and maintenance of TooCard (e.g. services such as sentry.io and Mixpanel);
- c. our legal advisors to the extent that such disclosure is necessary to obtain legal advice or protect our rights in legal proceedings.

International data transfers

Whenever possible, we will try to use processors which process personal data within the European Economic Area (“**EEA**”). In case there is a need for us to use processors located outside of the EEA, we will only disclose personal data to them provided that appropriate international data transfer safeguards described in the GDPR are in place.

As of the date of this Privacy Policy, we transfer information that you provided us with to the United States of America. Such transfer relies either on Binding Corporate Rules implemented by our subprocessors or standard data protection clauses approved by the European Commission.

If you have further questions about international data transfers that we make or want to obtain a copy of the safeguards that are in place to guarantee the legality of the transfer you can contact us by sending an email at privacy@tooploox.com.

Changes to the Privacy Policy

We constantly review our Privacy Policy and strive towards making it better. That is why we reserve the right to amend this Privacy Policy from time to time. We will not reduce any of your rights stated in this Privacy Policy without asking for explicit prior consent to the changes.

How to contact us and seek additional help?

If you have any questions or doubts related to this Privacy Policy or want to know more about how we protect your personal data or your rights, you can contact us by sending an email at privacy@toopllox.com.

We hope that we will be able to answer all your questions and settle all disputes amicably. Nonetheless, if you think that your rights were not observed or that your privacy was harmed, you can always lodge a complaint with a competent data protection authority.

Effective date 01.08.2020