

PRIVACY POLICY

1. Operator of the service: www.halfway-app.com (the “Service”) is Cometari Dedicated Solutions spółka z ograniczoną odpowiedzialnością spółka komandytowa based in Kraków (Radzikowskiego 100C/5, 31-315 Kraków), entered into the Register of the National Court Register kept by the District Court for Kraków-Śródmieście in Kraków, XI Commercial Division of the National Court Register, under KRS number 0000651188, NIP: 9452200297, REGON: 366043595, e-mail: info@cometari.com (the “Operator”).
2. This Privacy Policy describes the ways in which the Operator gathers, processes and uses information about individual persons who use the Service, contact the Operator or enter into agreements with the Operator (“Users”).

I. PERSONAL DATA

1. The Operator is the data controller of the personal data of the Users.
2. All personal data is gathered, processed and used by the Operator in accordance with the rules set out in the 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 (“RODO”).
3. The Operator gathers, processes and uses personal data to provide Users with the services and in order to implement the agreements (the legal basis of processing personal data of Users provides: Art (1) (b) RODO), communicate with Users and answer Users for the questions about the services (the legal basis: Art. 6 (1) (f) RODO). The legal basis or processing personal data are also in some cases special legal provisions that allow the Operator to process personal data in order to fulfill a legal obligation - for example accounting and tax regulations (the legal basis: Art. 6 (1) (c) RODO).
4. The legal basis or processing personal data in order to send Users marketing materials - newsletter is the consent of the User (the legal basis: Art. 6 (1) (a) RODO). User has the right to opt out of receiving the newsletter at any time. Requests may be sent to the Operator at the contact information set out above. The withdrawal of consent does not affect the lawfulness of the data processing which has been made on the basis of consent before its withdrawal.
5. This Operator collects following types of personal data: e-mail address, first name, last name.
6. Providing personal data is voluntary. However, a refusal of providing personal data may make it impossible to perform the services. By filling the contact form on the Service website, commenting posts on the Service blog or entering into agreements with the Operator, Users allow the Operator to collect, process and use personal data of the Users to identify them and to provide Users with services.
7. The Operator attaches special importance to protect privacy of the Users and takes appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of the processed personal data.
8. The Operator exercises continuous control over the processing of personal data and restricts access to them as much as possible. The Operator will not sell, share or otherwise distribute the personal data of the Users to third parties. The Operator will not transfer the personal data to countries outside of the European Union. The Operator may only entrust data processing without the change of the hereinabove indicated aim of its processing, to the entities who act for or on behalf of the Operator, who perform the following services: website and IT support services, payment services, data storage services including cloud computing, accounting or legal services. These third parties have contracted with the Operator to only use personal data for the agreed upon purpose, and not to sell or disclose personal data to third parties.
9. Personal data will be processed only for the period that is necessary for the proper performance of the services, pursuing claims in connection with the performance of

the services, and for the period that is necessary for the obligations arising out of the provisions of law (for example to fulfill the accounting and tax obligations - 5 years). For marketing purposes, the data will be processed and stored for the duration of the contract or until the User notifies the Operator objection to such processing of personal data.

10. Personal data are not subject to profiling as one of forms of automatic processing of personal data.
11. Each User has the right to access, correct, modify or delete his personal data, the right to request restriction of processing of his data, the right to data portability and the right to notify objection to the processing of personal data. Requests may be sent to the Operator at the contact information set out above.
12. Each User has the right to lodge a complaint to the General Personal Data Protection Officer (Urząd Ochrony Danych Osobowych (UODO), ul. Stawki 2, 00-193 Warszawa, Polska, website: <http://www.uodo.gov.pl/>) as regards processing of personal data by the Operator.

II. COOKIES POLICY

1. The Operator does not automatically collect any information, except information contained in files "cookies".
2. Cookies are computer data, in particular text files that are stored in the User's end device and are intended for the use of the websites of the Service. Cookies typically contain the name of the website, the period of storage on the User's end device and an unique number.
3. By using the Service you agree to use cookies in accordance with this Cookies Policy. If you do not agree to Operator's use of cookies, you should change your browser settings or opt out of using the Service.
4. The Service obtains information about Users and their behavior in the following way:
 - a) by writing to the User end devices files cookies,
 - b) by collecting logs, web server by User web host.
5. Cookies are used by the Operator for the following purposes:
 - a) produce statistics that help to understand how the Users use the Service, which allows the Operator to improve the Service structure and content;
 - b) adjust the content of the Service pages to the User's preferences and optimize the use of the Service;
 - c) maintenance of the User's sessions in the Service;
6. The Operator uses two basic types of cookies:
 - a) "Session" (session cookies) and
 - b) "Permanent" (persistent cookies)."Session" cookies are temporary files that are stored in the User's end device until User logs out and leaves the website or closes the browser. "Permanent" cookies are stored in the User's end device for the time specified in the parameters of "permanent" cookies or until their removal by the User.
7. Software to browse the websites (browser) usually by default allows storage of cookies in the User's end device. Users can change the settings of cookies in their browser. Web browser allows the User to remove the handwritten cookies. User can also automatically block cookies, referring to the help section, or documentation of the web browser.
8. Restrictions on the use of cookies may adversely affect the efficiency of some of the functionalities available in the Service.
9. The information contained in files "cookies" is processed by the Operator for technical purposes to ensure that the Service is functioning properly and for statistical purposes. The legal basis of data processing is the legitimate interest of the Operator (the legal basis: Art. 6 (1) (f) RODO).