

EMAIL CORRESPONDENCE PRIVACY NOTICE

This notice describes how RTB House processes your personal data regarding the RTB House business activity and follows transparency obligations arising from personal data laws, specifically Articles 13 or 14 of the General Data Protection Regulation ('GDPR').

DATA CONTROLLER



The controller of your personal data is RTB House Italy s.r.l. with its registered office at Piazza Euclide 47 CAP 00197 Roma, hereinafter: **"we"**, **"us"** or **"RTB House"**.

CONTACT DETAILS



You can contact us in the following manner: (1) by mail at: 61/101 Żłota St., 00-819 Warsaw, Poland, (2) by e-mail: dpo@rtbhouse.com, (3) or by telephone: +48 22 188 12 71.





CATEGORIES OF COLLECTED DATA AND PURPOSES FOR THE PROCESSING









We process the following categories of personal data for the purposes outlined below:

- (a) **execution of a contract with you:** your email address, name, surname, mobile phone, delivery address, parcel tracking number, position in a company, representation of a signature, an entrepreneur register number, bank account number and other bank details, tax identification number, credit history and related information, and any other personal data needed for the purpose of execution of contracts (including e.g. service provision, client support, delivery of the documents), negotiations, credit risk assessment, tax verification procedures, billing, invoicing, payments management, cost settlement, debt collection, dispute resolution (on the basis of necessity for the performance of a contract with you, our legitimate interest or the legal obligation);
- (b) **execution of a contract with a company that you represent:** your email address, name, surname, mobile phone, delivery address, parcel tracking number, position in a company, representation of a signature, credit history and related information, and any other personal data needed for the purpose of the execution of contracts (including e.g. service provision, client support, delivery of the documents), negotiations, credit risk assessment, tax verification procedures, billing and invoicing, payments management, cost

	<p>settlement, debt collection, dispute resolution (on the basis of our legitimate interest or the legal obligation);</p> <p>(c) marketing activities: your email address, name, surname, mobile phone, position in a company, representation of a signature, the activity of contacting you, social media information (username, links to profiles etc.), and other information that you provide to us for the purpose of direct marketing activities e.g. event management and participation, customer acquisition, collecting feedback, conduct surveys (on the basis of our legitimate interest);</p> <p>(d) business communications analysis: your email address, name, surname, mobile phone, position in a company, activity related to contacting you, social media information (username, links to profiles, etc.), and other information that you provide to us for the purpose of communication with you regarding business matters, and conducting other business operations, e.g analysis of the frequency of contact with you and analysis of our business relationship (on the basis of our legitimate interest);</p> <p>(e) security and legal compliance: your email address, name, surname, mobile phone, position in a company, representation of a signature, and other information that you provide to us for the purpose of our security and our legal compliance including fulfilling obligations stemming from tax and accounting laws (on the basis of our legitimate interest or the legal obligation);</p> <p>(f) handling incoming emails and other communication: your name, surname, email address, company entity, job title, conversation history, and other information that you provide to us via email or any other means of communication for the purpose of communication with you and administrative purposes (on the basis of our legitimate interest);</p> <p>(g) contact list maintenance: your name, surname, email address, phone number, job title, address, company entity, business unit division, conversation history, and other information that you provide to us for the purpose of maintaining a contact with us (on the basis of our legitimate interest or necessity to perform the contract);</p> <p>(h) translation services: your name, surname, signature, email address, job title, address, company entity, and other information included in the documents or correspondence, subject to translation services for the purpose of organizing the translation of the documents or correspondence (on the basis of our legitimate interest, the legal obligation or necessity to perform the contract);</p> <p>(i) occasional gifts: your name, surname, delivery address, phone number, company entity, work email address, job title, and other</p>
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	<p>information that you provide to us for the purpose of organizing the occasional gifts delivery (on the basis of our legitimate interest);</p> <p>(j) improvement of service quality and internal sales-staff training: voice recording, image, content, and transcriptions of the meeting made during conversations or video meetings regarding the sale of RTB House's services (on the basis of our legitimate interest).</p>
<p>LEGAL BASIS FOR THE PROCESSING</p> 	<p>The legal basis for processing of your personal data as indicated in the above row depends on the purpose for which the personal data is processed, it might be either:</p> <ul style="list-style-type: none"> (a) necessity to enter into a contract with you or to take steps at your request prior to entering into a contract, (b) our legitimate interest in establishing business relationships, conducting negotiations, performing contracts, executing settlements, client acquisition, brand awareness, managing client relationships, developing sales, improving sales management, maintaining contact with you, performing our administrative tasks, translation services, occasional gifts delivery, (c) our legitimate interest in legal and compliance obligations, such as preventing fraud, facilitating incident response, and preventing cyber attacks, or (d) our legal obligation to process your personal data stems from generally applicable laws.
<p>RECIPIENTS OF PERSONAL DATA</p> 	<p>RTB House may disclose your personal data to:</p> <ul style="list-style-type: none"> • RTB House associates, • subcontractors, where necessary, • other companies within the RTB House corporate group for administrative purposes, • law enforcement agencies, supervisory authorities, or courts when required by law.
<p>TRANSFERS TO OTHER COUNTRIES</p> 	<p>RTB House will not transfer your personal data outside of the EEA unless necessary measures are taken to ensure compliance with applicable laws. These measures may include transferring data to a country deemed to provide adequate protection by the European Commission (Article 45 GDPR) or pursuant to Standard Contractual Clauses (Article 46 GDPR). You can obtain a copy of these clauses by contacting our DPO.</p>
<p>RETENTION PERIOD</p> 	<p>We will store your personal data for the period necessary to fulfill the purposes outlined above. Specifically:</p>

	<ul style="list-style-type: none"> personal data for contract execution will be processed until potential claims are time-barred or until the retention period provided in the generally applicable laws, personal data in accounting documents will be stored according to legal retention periods, and until claims are time-barred, personal data processed for legitimate interests will be stored until an objection is made or the data's usefulness expires.
DATA SUBJECT'S RIGHTS  	<p>You have the right to know about the data processing we conduct and what personal data we have about you. If you would like to receive a copy of your personal data, we will provide such a copy for you.</p> <p>If your personal data is wrong or incorrect, you can tell us and we will fix it. Until that happens, you have the right to restrict the processing and it will be limited to storage only for that time.</p> <p>If you no longer wish to have your personal data processed you can also exercise your right to object or ask for its erasure. In certain situations we may still keep some of your personal data even after your request. This may happen due to the legal obligation imposed on us or in order to meet our business needs.</p> <p>To know more about your data protection rights and how to exercise them, you can contact our data protection officer at: dpo@rtbhouse.com.</p>
SOURCE OF PERSONAL DATA 	<p>We obtain your data directly from you, your employer, contractors, or colleagues, from publicly available sources such as public registers, databases of entrepreneurs, professional networking platforms, scoring reports provided by our partners, or online tools like LinkedIn.</p>
OBLIGATION TO DISCLOSE PERSONAL DATA 	<p>Your personal data is required to enter into a contract or manage a business relationship with you or your company.</p> <p>In other cases, providing your personal data to us is voluntary but necessary for conducting marketing activities, business communications analysis and ensuring security and legal compliance by RTB House. If you don't provide us with your personal information, you may not be able to cooperate with us and the abovementioned purposes may not be reached.</p>

<p>AUTOMATED DECISION-MAKING</p> 	<p>We will not use your data for automated decision-making or profiling.</p>
<p>RIGHT TO LODGE A COMPLAINT</p> 	<p>You have the right to file a complaint with the authority that oversees data protection for RTB House or for the country where you live. You can find the contact information for these authorities on this website.</p>